

2026 -  
2040

# Draft Old Oak Neighbourhood Plan



Pre-submission Consultation  
Version July 2026

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Following an initial stage of pre-submission consultation, the Old Oak Neighbourhood Forum will be submitting to OPDC three separate documents:

- a) A Consultation Statement setting out responses to the first stage consultation and the Forum's responses to these
- b) A final Basic Conditions Statement setting out how the Draft NP meets these
- c) A revised Submission Version of this Draft Neighbourhood Plan

This draft neighbourhood plan has been prepared by members of the Old Oak Neighbourhood Forum. See for details at [www.oldoakneighbourhoodforum.org](http://www.oldoakneighbourhoodforum.org)

# OLD OAK NEIGHBOURHOOD PLAN 2026-40

## Chapter 1 The context for this draft neighbourhood plan

1.1 The first part of this Draft Plan explains the unusual context in which this neighbourhood plan has been prepared. The neighbourhood area was designated in 2017 and the Forum in 2018. Why has the Forum chosen to progress a neighbourhood plan nearly a decade later?

1.2 The Forum (OONF) has been working since 2016 to try to influence the plans of the Old Oak Development Corporation. We have 150 members and work together with all the local residents associations in the area, the Grand Union Alliance, the Old Oak Alliance, as well as the other neighbourhood forums and amenity organisations such as Ealing Matters and the Hammersmith Society.

1.3 We believe that there could be an alternative to the 2025 OPDC Masterplan Framework for the eastern end of Ealing Borough.

1.4 OPDC have advanced their proposals for high density high-rise housing for this part of Ealing, to the stage of seeking a private sector developer to deliver a 2025 Masterplan Framework for the area between Willesden Junction and North Acton station. A total of 31 hectares of land has been assembled for future development. 17 hectares are owned by the Department of Transport and in use by HS2 for construction compounds. The remainder of the land has been acquired by OPDC.

1.5 Back in 2015 the Development Corporation took over planning powers from Ealing, Brent and Hammersmith & Fulham Councils. At that time a new 'vision' for Old Oak was drawn up by the then Mayor of London, Boris Johnson. This was for 'transformational' regeneration that would result from the 'catalyst' effect of building the HS2/Elizabeth Line/GWR rail interchange at Old Oak Common.

1.6 This location was hailed as becoming the 'best connected' place in the UK if not the whole of Europe and therefore a magnet for investment in new development.

**1.7 The £1.7bn station (under construction) was originally due to open this year (2026). Subsequently the timeline shifted to 2029-2033. The HS2 project was cut back in 2023 and now consists of a high speed rail line between London and Birmingham. In May 2026 the Government announced further delays with completion of the HS2 project due some time between 2036 and 2039. This is at least a decade late. When a Euston terminus will be built, and how it is to be funded, remains uncertain. The Euston platforms for HS2 will not open before the 2040s.**

1.8 The HS2/Elizabeth Line/GWR rail interchange at Old Oak, as a 'catalyst' for regeneration, has instead become a follow-on. In successful examples of urban expansion in cities like Paris, Amsterdam or Vienna new transport infrastructure has preceded new housing. The eventual impact of the OOC rail interchange on the

surrounding area remains uncertain, given that its role as a terminus may last only a few years (until Euston takes on this role).

1.9 After a decade of tracking every step of the (changing) plans of OPDC, we are not convinced that the Development Corporation is now following the right path. There has been no substantive rethink of plans since a 2023 Outline Business Case was agreed with Government. **We see 2026 as a critical moment when there should be wider public debate on the OPDC Masterplan**, before decisions are made on the selection of a ‘master development partner’ to enter into a joint venture with the Corporation.



*Figure 2. Aerial view of the Old Oak Illustrative Masterplan, looking south towards the Town Centre.*

1.10 We also view the Masterplan proposals as failing to create the long-promised ‘exemplary’ new part of London. The plans are heading towards ‘more of the same’ as at other regeneration areas across London – a set of high-density Build to Rent towers that do little to provide long-term homes for families. The amount of genuinely affordable housing involved looks set to shrink well below 35%, as is happening across London (including at the neighbouring Kensal Canalside Opportunity Area). This model of housebuilding is not working. So why does it make sense to repeat it now, a decade

before this Opportunity Area will have the public transport to sustain very high density housing?

1.11 There is growing evidence that Londoners are turning the backs on this model for ‘regeneration’. In 2026 the property values of new build studios and 1-2 bed in high-rise blocks in London are falling unexpectedly fast. There is a pipeline of newly built flats which are not selling or renting. This includes new developments in Scrubs Lane for which OPDC gave permission in 2017/8 (prematurely as was argued by local residents at the time). The completed development 605 flats at Oaklands Rise is another example.



Oaklands Rise (part Notting Hill Genesis, part market housing). Incoming residents took up occupation from 2022 on the promise of ‘a station on your doorstep by 2026’.

1.12 The Old Oak Neighbourhood Forum will be submitting this Draft Neighbourhood Plan to the OPDC after an initial six week period of ‘pre-submission consultation’. **We hope that it will gather support from local people and other consultees, at this first stage.** OPDC will then be required to publish the Draft Plan on its website for a further formal 6 week ‘publicity’ period.

1.13 The Plan will then be ‘independently examined’ to ensure that it meets the legal requirements for adoption as part of the development plan for this eastern part of Ealing. The statutory ‘development plan’ is made up of the London Plan (a new version of which is about to be consulted on), the OPDC 2022 Local Plan, and any ‘made’ (adopted) neighbourhood plans. The Harlesden Neighbourhood Plan is one of these, currently also being updated. All planning applications are assessed against the development plan.

1.14 If endorsed by an independent ‘Examiner’ a local referendum would be held on a final version of this neighbourhood plan. If supported by more than 50% of those on the electoral register in the neighbourhood area, OPDC would be expected to bring the neighbourhood plan into force and to use its policies when deciding planning applications within the Old Oak neighbourhood area (map on page 12).

1.15 One of the several reasons why we are progressing this neighbourhood plan is because the OPDC’s Masterplan Framework has **not** been prepared, consulted on or ‘examined’ as a development plan document. It is a prospectus or ‘guidance’ that OPDC hope will attract interest from developers. The Forum believes that it should be given limited ‘material weight’ in future planning decisions. But given that the planning

committee in question is part of the OPDC, can we be confident that the committee will give priority to the content of the 2022 adopted Local Plan? Or treat the Masterplan with more seriousness than should be the case?

1.16 This Draft Neighbourhood Plan sets out proposals for five 'sub-areas' within the neighbourhood area. In each case, site allocation and housing numbers are put forward. We comment on the OPDC Masterplan proposals for four of these five sub-areas, so that the public can compare with those in this Draft Plan.

1.17 OPDC launched its procurement exercise to select a master development partner at the end of May 2026. The process involves two stages, leading up to selection of a chosen private sector partner in January 2027. OPDC expect to see construction at the first set of development sites underway in 2029. **Four of these seven 'Phase 1' sites lie within the Old Oak neighbourhood boundary.**

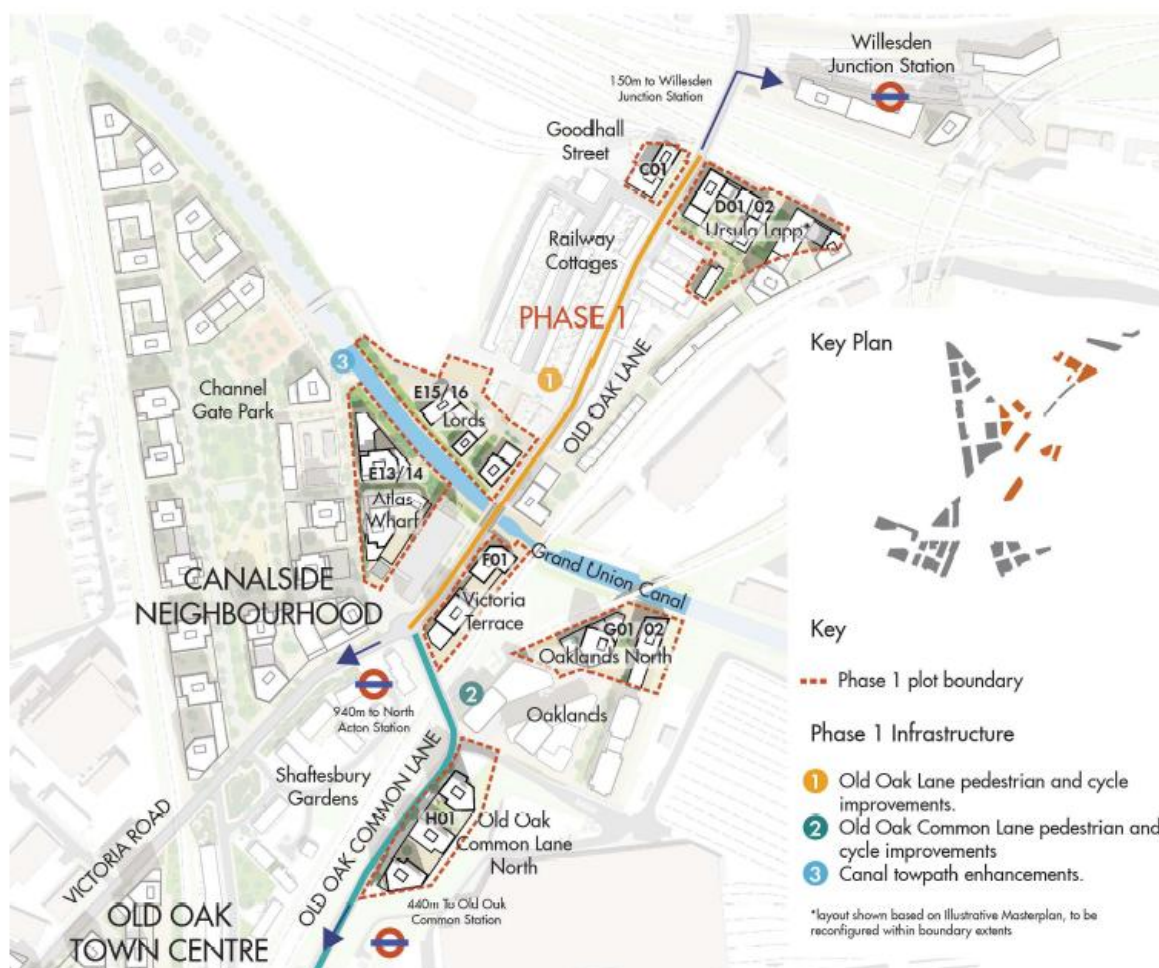


Figure 1. Summary of Phase 1, based on the Illustrative Masterplan

1.18 The [OPDC Masterplan Framework](#) is the primary blueprint that has been issued to developers bidding to be chosen by OPDC as a development partner. **The status of this document is not even that of a Supplementary Planning document, let alone a local plan.** A SPD would have gone through a statutory consultation process (as was the case for the 2024 Old Oak West SPD). The Masterplan was described as

‘illustrative’ when limited consultation took place in 2025. Some of its key features, such as the location of a new Old Oak Town Centre are different from OPDC’s adopted 2022 Local Plan.

1.19 For these reason, the Forum (OONF) believes that the Framework will carry limited ‘material weight’ when planning applications come to be decided. OPDC disagree, but have not published any legal advice on the question. Their repeated form of words is that the Masterplan is **capable of being treated as a material consideration in the context of determining future planning applications**. Time will tell. Those bidding to become a development partner will need to make their own judgements on what level of assurance the Masterplan Framework provides.

1.20 **If the Old Oak Neighbourhood Plan proceeds successfully through the stages of examination and referendum, and is adopted by OPDC, its site allocations and policies will have full ‘development plan weight’**. The Forum offered OPDC the route of using the neighbourhood plan framework as a means of achieving early statutory underpinning for development proposals via a ‘co-operative’ neighbourhood plan. We also offered the option of agreement on an extended neighbourhood area to cover more of the Masterplan area. Because a jointly agreed neighbourhood plan would need to be based on lower housing densities than OPDC aspire to, there has been no interest from the Development Corporation in pursuing these routes.

1.21. The next OPDC Local Plan, on which work is now getting underway, is not timetabled for adoption until December 2029. **Meanwhile the 2022 Local Plan remains the statutory policy context to which all planning applications must comply**.

1.22 **If nothing else, we hope that consultation and public debate on this Draft Neighbourhood Plan will give local people the chance to question and challenge OPDC’s assumptions and proposals**. Ealing is at the final stages of adopting a new Local Plan, after years of consultation. This will show the eastern end of the Borough as a blank space on the map. We see this draft neighbourhood plan as a realistic way of helping to fill this blank space, with new housing proposals of a type and density that will leave a sustainable and successful legacy for Ealing Council (and for LBB and LBHF). There will (or should) come a time when the Development Corporation hands back its planning powers to the three Borough Councils, as the London Legacy Development Corporation has already done in the Olympic Park area in east London.

### **The Opportunity Area context for this neighbourhood plan**

1.23 As part of preparatory work on the next London Plan, the GLA published in June 2025 a set of ‘pen portraits’ assessing the progress since designation of each of the capital’s 47 Mayoral Opportunity Areas. The summary for the Old Oak and Park Royal OA is shown below.

1.24 This GLA analysis placed this Opportunity Area in the category of ‘*Moving Forwards*’. This is a move two levels upwards from ‘*Nascent*’ in the previous

assessment. The justification provided for this significant uplift is limited, saying *a lot of development sites have been allocated and pre-planning is going on for approved sites*. The reality has been that in the decade since the OPDC began its work, progress on the ground has been much slower than anticipated. The Local Plan (originally due to be completed by 2017) was finally adopted in June 2022.

## Old Oak/Park Royal Moving forward

**Homes Delivery**


- Since the establishment of OPDC, 4,307 homes have been completed. 2,854 homes have been completed since 2019/20.
- The OA has a pipeline of 7,852 new homes.
- Considering the completions and pipeline, the OA is meeting 78 per cent of its 10 year capacity. Current completions alone account for 11 per cent of the London Plan 22 year capacity and 20 per cent of the 10 year capacity.
- The OA large scale development sites are HS2 construction sites. The delay to HS2 alongside wider market factors has influenced the rates of delivery.
- 31 per cent is public land. OPDC is in the process of acquiring a number of sites in the Old Oak area.

**Jobs**

- The OPDC monitoring data shows a net gain of 190,249sqm industrial floorspace being achieved since 2015.
- OPDC currently developing economic vision, and will be updating its economic evidence base for its next Local Plan.
- The OA sits in the West Tech Corridor as identified in the London Growth Plan.
- Important to consider the role of the OA alongside the Heathrow narrative/ future OA vision.

**Proposition**

- Update status from 'Nascent' to 'Underway' as a lot of development sites have been allocated and pre-planning is on-going for approved sites.
- Continue to optimise deliver of homes and jobs through future updates to OPDC's Local Plan and delivery of OPDC's proposals for Old Oak.
- Joint working with OPDC, TfL and central Government to maximise benefits for London and Londoners.



Source: Old Oak Common Station Plaza Gardens

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Extract from [GLA 2025 'pen portrait' of the Old Oak and Park Royal Opportunity Area](#)

1.25 New developments completed or consented to date in the OPDC area lie in a handful of locations as shown below. In terms of new housing built to date the main location is the 'North Acton Cluster' of apartments and student rooms at North Acton.



Source: vucity

**KEY**

- Consented
- Under Construction
- Completed
- Opportunity Area

Page 18 from the 2025 GLA pen portrait of the Old Oak and Park Royal Opportunity Area showing the VuCity model of development as at 2021.

**1.26 One of the main aims of preparing this neighbourhood plan is to offer an alternative approach to high density high-rise car-free development being built long before the transport infrastructure is in place to support this building typology.**

1.27 Contrary to repeated claims by the Development Corporation, most of what is now defined as the Old Oak Masterplan area **is not at present a ‘well connected place’ in transport terms.** Local residents know this reality all too well, but we worry that both HS2 and OPDC describe the area as **already** having very good (or even ‘exceptional’ or ‘unparalleled’) transport links. As measured by the new [Department of Transport ‘Connectivity Tool’](#) the designated Old Oak neighbourhood area has comparatively low scores for a location on the border of Inner London.

### **The transport context for this neighbourhood plan**

1.28 The OPDC Strategic Transport Study which formed part of the evidence base for the OPDC Local Plan dates back over a decade to 2015. There has since been no modelling data available in the public domain, on numbers of HS2, GWR and Elizabeth Line passengers forecast to use OOC station as a destination or departure point, rather than as an interchange at which to continue their journey. Since 2022 OPDC/TfL/GLA have between them commissioned further transport modelling at a cost of £420,000. None of the results are yet available to the public.

1.29 In the long term, a rail ‘interchange’ will have a different impact than a station which acts as a HS2 terminus. Whether the Old Oak area is to be regenerated as a ‘destination’ or as a transport interchange is a fundamental decision that we think needs debate - **before** the scale and density of development around the new station is locked into 20-30 year joint venture agreements with a development partner.

1.30 The [original planning framework for the Opportunity Area](#) envisaged a much improved local road network with several new east-west road connections. These included a proposed ‘Wormwood Scrubs’ street extending eastwards to open up the Kensal Canalside Opportunity Area. In 2026 **no such transport improvements have a firm or funded place within the Local Plan period 2028 – 2038.** More details of the transport context for this neighbourhood plan are at 2.27 below.

### **OPDC Land Assembly**

1.31 In the past 18 months OPDC has acquired substantial landholdings within the Old Oak project area. These lie alongside the four major sites owned by DfT and in use as HS2 construction compounds. These land assets OPDC has either acquired outright or has taken control of the companies involved. The expenditure involved (now over £300m) has been financed mainly through loans from [Greater London Land and Property Limited \(GLAP\)](#). This body hold property assets on behalf of the Mayor of London.



Figure 1. Land Ownership Plan

1.32 At the start of its life in 2015, OPDC was not provided by the then Government with any capital budget for land assembly. The assumption was that development would proceed via funding from increased land values created by OPDC's planning functions. A new Local Plan, including the release of Strategic Industrial Land for higher value residential use, was expected to generate substantial capital resources

1.33 In March 2019 OPDC [‘welcomed’ an award of £250m of Housing Infrastructure Funding from Government](#). The bid had been made in 2018 and formed the basis of OPDC's Draft Local Plan as submitted to the Secretary of State. This turned out to be a ‘provisional award’ on which OPDC subsequently failed to meet the MHCLG grant conditions on delivery of homes. The HIF grant was cancelled <sup>1</sup>.

1.34 In 2026, OPDC's ambitions for its Masterplan Framework remain highly ambitious and continue to assume an ultimate 25,000 housing target for the Opportunity Area. The Forum has always argued that this London Plan target was inadequately researched should be revised downwards to 15–18,000 new homes. The 2025 Masterplan area is planned to deliver 8000 new homes, which we consider would

<sup>1</sup> See the London Assembly Budget and Performance Committee [2021 report](#) on this period of OPDC's history. This concluded that *OPDC has spent £42.7 million, even though five years on, little has been done on the ground to bring any new jobs or homes to the area.*

involve excessive densities and building typologies wholly unsuitable for the period 2026-40. **Old Oak Common station will not be providing the necessary public transport links for most (if not all) of this period.**

1.35 We see the alternative scenarios of Old Oak as a ‘HS2 terminus and destination’ as compared with the original HS2 plans for an ‘interchange in a green field’ as leading to sharply different long-term outcomes. **It will be the Borough Councils which inherit these long-term outcomes.** Ealing and to a lesser extent Brent and LBHF will be dealing with the consequences that could arise from misguided and mis-timed plans by OPDC. What has emerged at North Acton in the past decade, under OPDC planning powers, has not set a successful precedent.



Early image of the design for Old Oak Common station. An ‘interchange in a green field’ with most passengers changing platforms to continue their journey.

## The OPDC Compulsory Purchase Order

1.36 In preparation for entering into a Joint Venture agreement with a master development partners, OPDC finalised an extensive [CPO Order](#) in September 2025 This potentially enables compulsory purchase of any remaining sites within the Masterplan area which remain in private ownerships. This CPO Order will ultimately be decided by the Secretary of State, with a public inquiry likely in autumn 2026 to consider objections submitted.

1.37 The [objection](#) to the CPO Order submitted by OONF in October 2025 argues that OPDC’s recent strategy of proceeding ‘at pace’ is flawed. We question whether OPDC has made the necessary public interest case for the use of CPO powers. The justification made in the Order as submitted to Government states *Progressing the Order now should ensure that a recognisable and attractive place is established by late 2030 to coincide with the opening of the Old Oak Common Station.* A 2030 opening date for the station was already outdated before the CPO Order was drafted. The timeframe has now shifted to 2036-39.

## **The OPDC Procurement exercise**

1.38 In late May 2026 the OPDC launched its procurement exercise to select a private sector partner as master developer for the 'project area' at Old Oak. Details of the process are [here](#) on the OPDC website. The tender documentation makes no mention of the Forum's proposals for a neighbourhood plan. As and when the identity of 3 (or perhaps 4) shortlisted major developers becomes known, the Forum will make contact with these firms (as is required of a neighbourhood forum as part of consultation with interested parties and landowners).

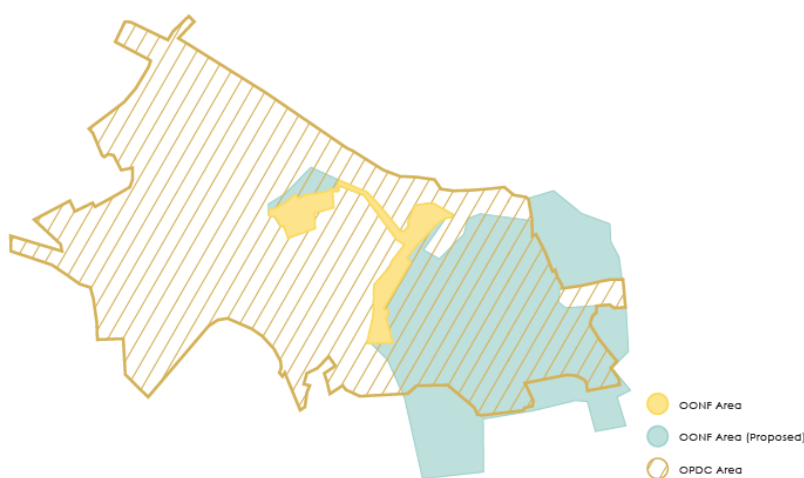
1.39 As shown on Map 2 on page 12 in the next chapter of this Draft Neighbourhood Plan, there is significant geographic overlap between the development zones/sites identified by OPDC as 'Phase 1' for delivery via the joint venture, and the boundary of the Old Oak neighbourhood.

## CHAPTER 2 what part could realistically be played by an Old Oak neighbourhood plan?

### The geographic extent of the designated Old Oak Neighbourhood Area

2.1 When the Old Oak Neighbourhood Forum first established itself as an ‘interim forum’ back in 2016, we applied to OPDC for a very large neighbourhood boundary covering the eastern half of the OA along with several residential settlements just outside the Development Corporation boundary (the area shown in blue on the map of the OPDC area shown in blue below). OPDC rejected this proposal and chose in 2017 to designate a much smaller 22 hectare in East Acton (shown in yellow).

Figure 1.4 OPDC and OONF boundaries



*Map showing original neighbourhood area applied for in 2027 as compared with that designated.*

2.2 This designated boundary (now slightly varied following an OPDC decision in 2021) is shown on the map above. This area designation remains in force as of 2026. This is why we are able to prepare a neighbourhood plan for the area. An unintended consequence of OPDC’s ‘change of direction’ in 2019 has been that the neighbourhood area lies within what OPDC has since defined as ‘Old Oak West’ and more recently as the ‘project area’ for the Development Corporation’s Masterplan Framework and Procurement exercise. This is not what OPDC expected to happen.

2.5 In 2021, the Forum applied to OPDC [for an extension of the designated neighbourhood area boundary](#) to include the land at Channel Gate and Atlas Road. Our application argued that this could provide a ‘Plan B’ route enabling OPDC to put in place fresh site allocations and policies at a time what the Corporation’s Post Submission Draft Local Plan was undergoing extensive modification by the Planning Inspector (with consequent delays).

2.6 The Forum’s application to extend the neighbourhood boundary from OONF was ‘refused’ by OPDC in November 2021. The slightly modified boundary was designated as shown in Figure 1 below.

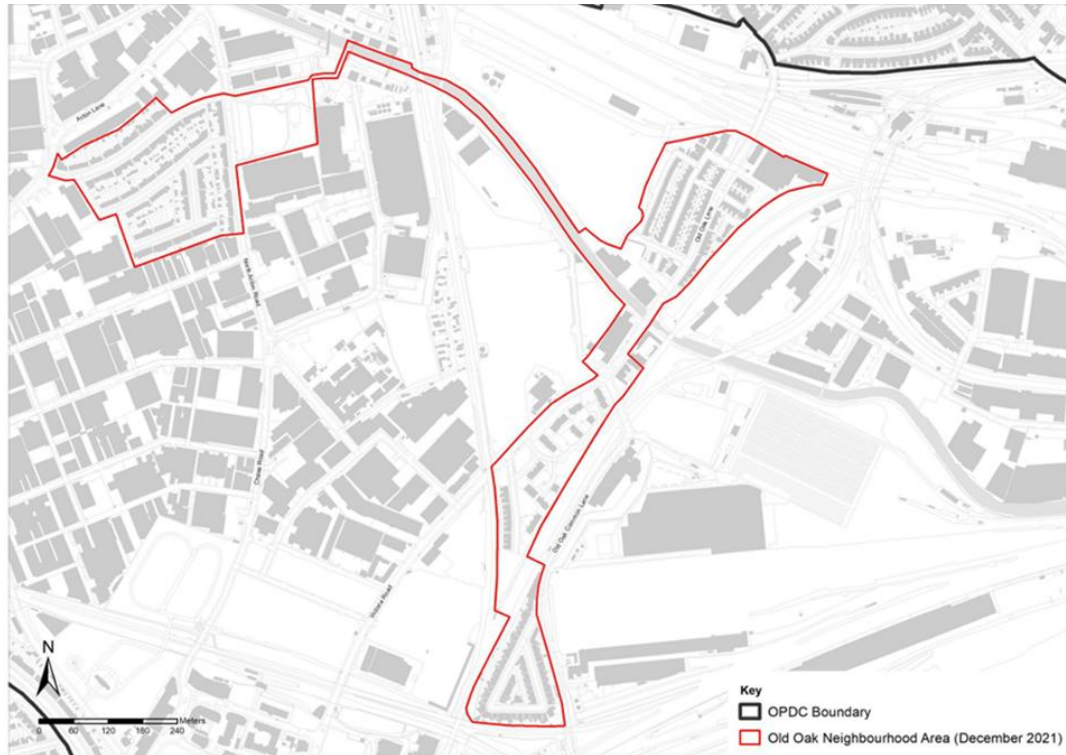


Figure 1 Old Oak Neighbourhood area boundary as designated by OPDC in 2021

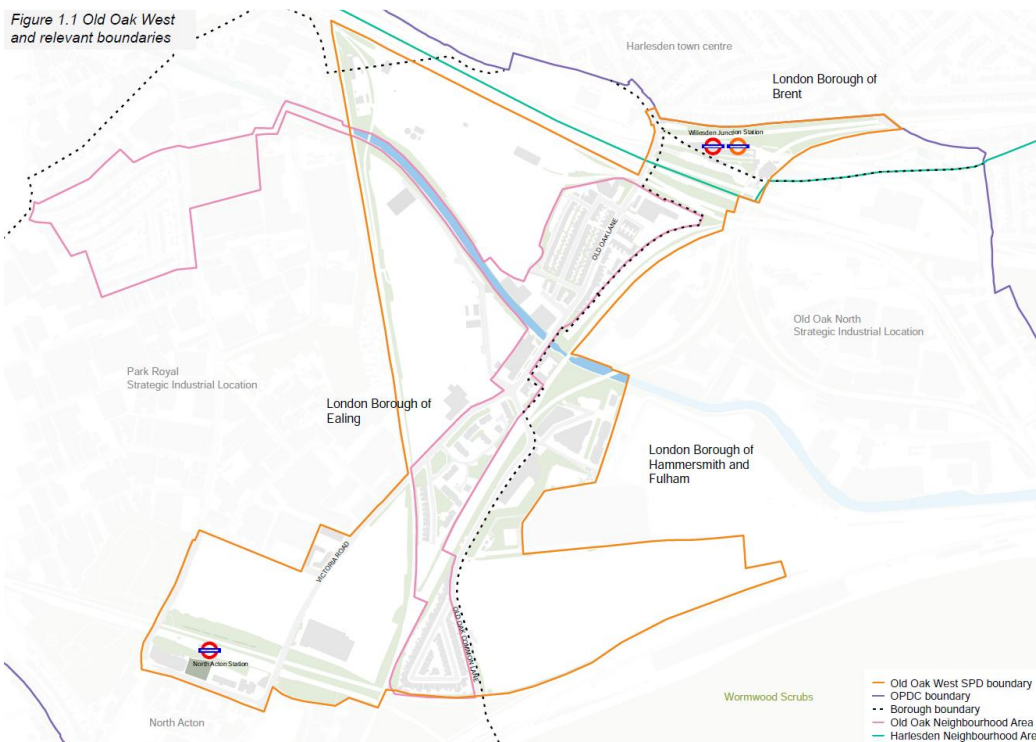


Figure 2 boundaries in the Old Oak area (LBE, LBB and LBHF borough boundaries shown as dotted lines)

The orange boundary is that introduced by OPDC for the Old Oak West SPD.

This document sought to present a spatially coherent area on which OPDC would focus following its 'change of direction' to the 'Western Lands' in 2019,

The SPD area includes part of what are 4 different 'Places' in the 2022 OPDC Local Plan.

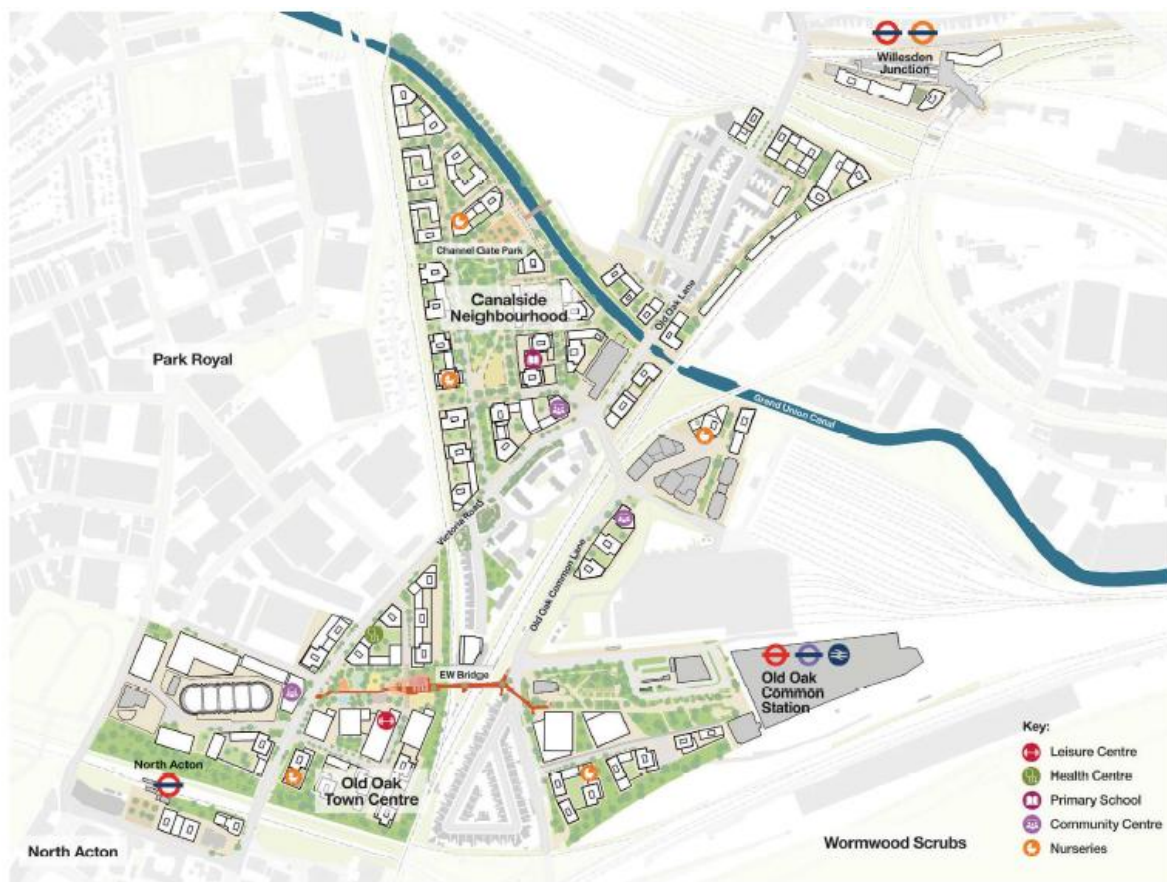


Figure 3. Old Oak Illustrative Masterplan

From OPDC May 2026 Position Statements issued to bidders in OPDC's procurement exercise

2.7 This pre-submission version of a Draft Old Oak Neighbourhood Plan builds on a version first published on the OONF website in 2019 and updated in 2021. The Forum did not progress earlier drafts to the stages of submission and public consultation by OPDC, given that there was no adopted Local Plan at that time. Since 2021, the continued uncertainties over HS2 plans and timelines have not provided a settled context in which to advance a neighbourhood plan.

2.8 The Forum is now progressing this draft neighbourhood plan as means of putting in place site allocations and housing proposals at density levels more appropriate than those which appear to be envisaged in the OPDC Masterplan Framework (no density figures are provided). The 2022 OPDC Local Plan did not identify proposed densities for its 42 site allocations in Table 3.1 (despite repeated requests for this information). Nor does the Local Plan include any policies on density.

2.9 By taking account of site sizes and proposed housing capacities it is possible to calculate likely net residential density figures comparable to those used for many years in London Plan policy and the former London Plan Density Matrix.

2.10 Most of the 77 references to 'density' in the Local Plan are to 'high density'. There is one passage of text which reads as below as part of Strategic Policy SP9:

*The indicative density range is 300 to 600 units per hectare. However, local context, character and environmental impacts are important factors to consider in the design process meaning development will be expected to deliver a range of densities and building heights, for example, responding with lower densities and building heights close to more sensitive locations and providing increased densities and building heights away from these sensitive locations and in areas of high public transport accessibility. Where appropriate, the Places policies set out more specificity about appropriate building heights, but in many parts of the area, there is a need for flexibility in the approach to achieving homes and jobs targets (see Chapter 4).*

2.11 A net density of 600 units/hectare is well above the 405 maximum in the former London Plan Density Matrix and would be classed by many as a ‘superdensity’ or ‘hyperdensity’. The recent work of the New Towns Commission, and subsequent indications from MHCLG suggest that a second period of high rise residential towers with superdensities may be drawing to a close (as happened in the 1970’s post the Ronan Point collapse). This is happening not least because of public antipathy to a building typology now linked with poor construction, cladding problems, overheating and high service charges for maintenance. The London Assembly Planning and Regeneration Committee has recently made the case for a return to ‘mid-rise’ housing and a reinstatement of the London Plan Density Matrix<sup>2</sup>

2.11 The Forum’s June [2025 submission to the Mayor of London](#) on the next London Plan makes the case for a downward review of the 2016 and 2021 housing target of 25,500 new homes at Old Oak and Park Royal in light of a changed context for the Opportunity Area since the days when this figure was first set. Publication of a first draft of the New London Plan is imminent. The view taken of the future of the OPDC area will have a bearing on the next stages of this draft neighbourhood plan.

### **What risks are seen by local people in delivery of OPDC’s Masterplan Framework?**

2.12 This is a difficult time in the London property market to be securing development interest, and locking this into place within a 20-30 year joint venture agreement. Will this part of London prove to attract the [£10bn of investment](#) that OPDC and HS2 have promoted?

2.13 OPDC’s Masterplan Framework departs in several significant respects from spatial plan and the policies in the 2022 adopted Local Plan. Some of these variations are mentioned in the final appendix of the document, titled **Consideration against Planning Policy**. We think this analysis plays down the obstacles for any development partner in working to site allocations and ‘development parameters’ **which do not have development plan backing**. The Framework document does not make clear that the 2022 OPDC Local Plan site allocations and policies are those which will need to be

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<sup>2</sup> [Between semis and skyscrapers](#). Report of the London Assembly Planning and Regeneration Committee

justified in terms of policy compliance as and when applications for individual sites come to be determined.

2.14 The following chapters covering each of the ‘sub-areas’ in this draft neighbourhood plan identify situations where departures from Local Plan policy will arise if the Masterplan is used as the basis for development. These include sites newly identified in the Masterplan as Tall Building locations, with no development plan support for their suitability (contrary to London Plan Policy D9). Such situations will not go unnoticed by a vigilant public, as and when schemes for these sites come forward.

2.15 Our Forum has deeper concerns that OPDC’s approach of progressing delivery ambitions via a non-statutory masterplan **will enable potential development partners to exploit the uncertainties involved in obtaining consents**, when it comes to negotiations on which side should bear these risks in any JV negotiations and development agreements.

2.16 **This is coupled with the growing level of debt on loans from GLAP which OPDC has taken on to acquire sites. On several large sites the extent of ‘land value capture’ will be limited.** This is because the land in question was already de-designated from SIL (Strategic Industrial Land) via the 2022 Local Plan, thereby creating residential values. At least one of the larger sites recently assembled by OPDC had already seen development proposals prepared by private sector applicants, and granted consent by OPDC for high density housing<sup>3</sup>. Others (such as the Lords site) were at pre-application stage. These recent and acquisitions by the Corporation, financed from loans, have been at market costs reflecting 2024-6 planning status, rather than that when OPDC was established in 2015. Had they been made nearer the start of OPDC’s life (and when £250m of HIF grant was available) land costs would have been very different.

## Key elements of this 14 year neighbourhood plan

2.17 This NP proposes a 14 year ‘plan period’ from 2026 to 2040 with a view to revision every five years or after adoption of the next OPDC Local Plan (a date scheduled as December 2029 in OPDC’s latest [Local Plan Interim Timetable](#)).

2.18 To rehearse briefly **why** the Forum is progressing this neighbourhood plan we see three main reasons:

- As the original prime mover for regeneration at Old Oak the HS2 project has fallen into total disarray. The continuing ‘reset’ may or may not prove to be the end of this story. In any event the impact as a ‘catalyst’ has largely vanished. The Old Oak area may continue to be promoted as a ‘West Tech Corridor’ or the

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<sup>3</sup> E.g. the site at Atlas Wharf changed hands in 2015 at a value *Between £200,001 and £500,000 on 30 July 2015*. Planning consent for a Build to Rent development with 457 homes was achieved by Pocket Living in late 2022 but was not progressed. OPDC obtained control of the site in 2024 at a cost understood to be £25m.

location for a ‘development boom’. But the reality is that its existing public transport connectivity is poor and its road network fragmented and unimproved, a decade into the life of the OPDC.

- We have serious hopes that the tide is turning on high density high-rise housing in London.
- The London housing market has shifted substantially in terms of financial viability. We question why OPDC has not revisited its overall strategy since the preparation of its 2023 Outline Business Case and Regeneration Strategy. A Mayoral Development Corporation, combining planning and delivery functions, is well positioned to be nimble and responsive to changed circumstances. We did not see this happen at the time when Cargiant withdrew its support for plans for Old Oak North in 2018. We have not seen it in response to the HS2 reset. Local people remain puzzled at the lack of any reaction from OPDC to the closure of the Cargiant business in April 2026 and the possible renewed availability of this 45 acre landholding – better positioned in relation to Old Oak station than the Old Oak Masterplan area.

### **Scope for Modern Methods of Construction (MMC)**

2.19 The Government’s response to the New Towns Taskforce points out that *“Large-scale new towns may also provide an opportunity for creating new on-site MMC production facilities, fostering innovation at the same time as creating local employment opportunities and skills.*

2.20 As the HS2 construction compounds in the Old Oak project area begin to be released, these would make ideal sites for MMC production facilities. As a development corporation already established for a decade, OPDC (in conjunction with GLAP and GLA’s Housing and Land Directorate) is well placed to build on LLDC experience to explore more direct delivery of new housing and piloting innovative models of MMC construction. OPDC’s links with Homes England, a body already undertaking work on models of New Towns housing delivery, would assist.

2.21 Homes England explicitly states that part of its mission is to *help build a more resilient, diverse and innovative housing sector, encouraging Modern Methods of Construction (MMC).* The [Lords Built Environment Committee 2024 report Modern methods of construction in the housing industry](#) was critical of the Conservative government’s approach to MMC and called for a coherent strategy to promote MMC use in housebuilding. We think that use of MMC at scale at Old Oak, led by OPDC/GLA Housing and Land Directorate could be a valuable test bed.

2.22 There are examples of volumetric MMC being used in new buildings at North Acton (e.g. on the former Castle Hotel site). But these (and many others in London) are for co-living or student accommodation suited to repetitive stacked units in tall buildings. The Forum continues to seek out good examples of where MMC has been used for the lower parts of tall developments or for mid-rise housing (such as Pocket Living’s Addiscombe Grove in Croydon).

2.23 Examples from Europe have yet to be replicated at any scale in London.



*Modular affordable homes in Copenhagen*

### **Key policies in this neighbourhood plan on affordable housing, net housing density and tall buildings**

2.24 The [Government response to the New Towns Taskforce](#) notes the recommendation that *new towns will include the aim of a minimum of 40% for affordable homes of which half is for social rent*. The response also comments that *They should also be designed to sufficient density, with everything residents need within easy access, including public transport and vital social infrastructure such as schools and GP surgeries*.

2.25 We interpret use of the term ‘*sufficient density*’ as a recognition that the era of high-rise ‘*superdensities*’ and ‘*hyperdensities*’ in London’s Opportunity Areas and regeneration zones may have passed its peak.

2.26 OPDC publishes no housing density metrics in its **Masterplan Framework** and has declined to respond to questions as to what assumptions were used by consultant architects Gort Scott for work on the Masterplan. The images in the document, with a significant proportion of high rise towers, suggests sites developed at densities of 600dph or more.

2.27 Page 156 of the OPDC Masterplan Framework sets out defined height parameters for a set of tall building locations. These include four of the five sites in the Old Oak

neighbourhood area (Ursula Lapp, the Lords site, Midland Gate and Goodhall Street). These sites do not lie in areas labelled as appropriate for Tall Buildings at Figure 3.15 of the OPDC Local Plan. Only 2a Victoria Road is within an area defined in this way. **This neighbourhood plan proposes mid-range heights.** It is against the 2022 OPDC Local Plan content, and not the Masterplan Framework, that an independent Examiner will be assessing this draft neighbourhood plan.

2.28 Our Draft Neighbourhood Plan is based on the principle that for the 2026-40 plan period Old Oak's transport network and connectivity levels **will not support net residential densities above 350 units/hectare** except on those sites closest to Willesden Junction as a transport node where mid-range PTAL levels can be achieved<sup>4</sup>.

2.25 The 2016 Regulation 18 version of the Local Plan was more explicit on densities than the subsequent versions. It provided the map overleaf colour coded with definitions of what the LPA considered to be a range from 'highest densities' to 'lower densities'.

2.26 The 'Preferred Policy' included at Regulation 18 stage was as below. This has not been forgotten by local people. To us this policy is close to what is now being proposed in the consultation version of the new 2026 NPPF, limiting the highest densities to locations around rail stations and at 'key destinations'. OPDC's 2016 draft policy wording read as below:

*3.27 OPDC has developed a draft Development Capacity Study (DCS) for review and comment alongside this draft Local Plan. This sets out OPDC's draft housing trajectory and shows how the area could accommodate the targets set out in the London Plan. The capacity analysis in the DCS identifies areas that could accommodate different densities. Suggested density levels that may be appropriate in different locations (see Figure 18) are:*

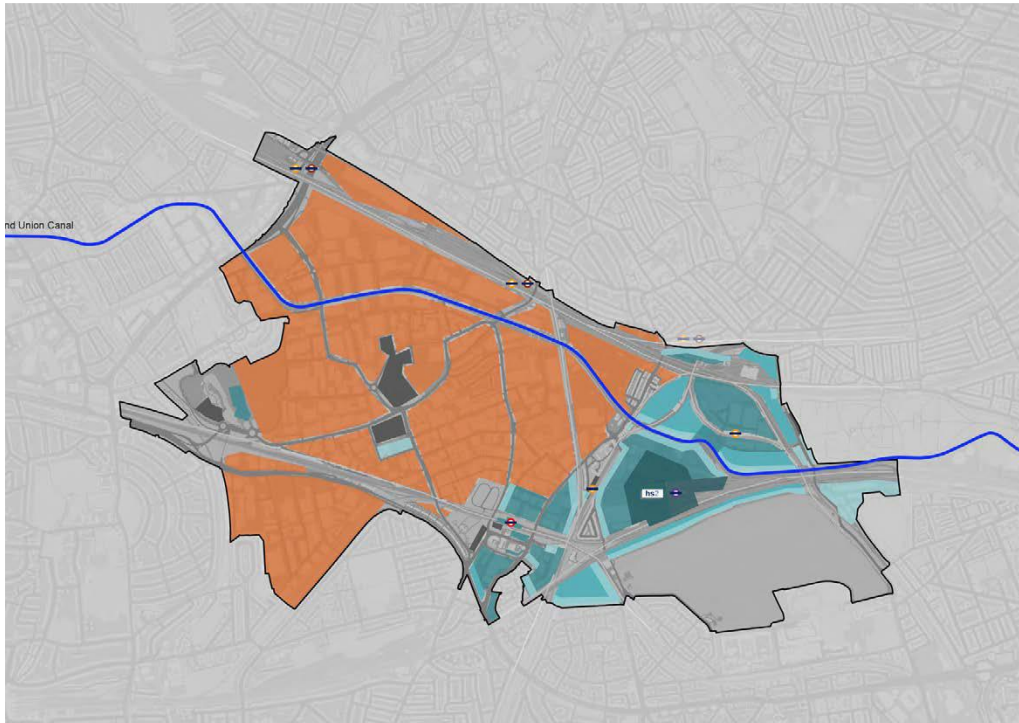
- *Highest* - Old Oak Common Station and surrounds: in the region of 600 units per hectare;
- *High* - Stations and key destinations: in the region of 550 units per hectare;
- *Medium* - Residential led areas: in the region of 405 units per hectare; and
- *Lower* - Sensitive edges: in the region of 300 units per hectare.

2.27 We will argue at Examination stage that subsequent iterations of the OPDC Local Plan provided no rational explanation for moving away from these density levels. We believe that this happened because OPDC was unwilling to explain to the Mayor of London (and the GLA team preparing the 2021 London Plan) that site availability constraints at Old Oak, given its geography, natural barriers such as the Grand Union Canal and further barriers such as railway lines, were not allowing for housing numbers at the levels simplistically assumed in the 2016 Further Alterations to the London Plan.

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<sup>4</sup> The introduction to the 2015 report [Super Density the Sequel](#) noted *We show that densities up to around 350 homes per hectare can be achieved in this way (corresponding to the top of the London Plan Density Matrix at 1,100 habitable rooms per hectare for central well-connected sites). Above that, we believe there should be a presumption against development, and that any exceptions should be subject to much more rigorous impact testing.*

A round figure of '25,000' new homes had become baked into GLA aspirations for '*London's largest brownfield site*'. Serious re-appraisal of this figure has never happened, albeit that Planning Inspector Paul Clark concluded that a reduced figure was needed for the 2018-38 period of the first OPDC Local Plan (2022).



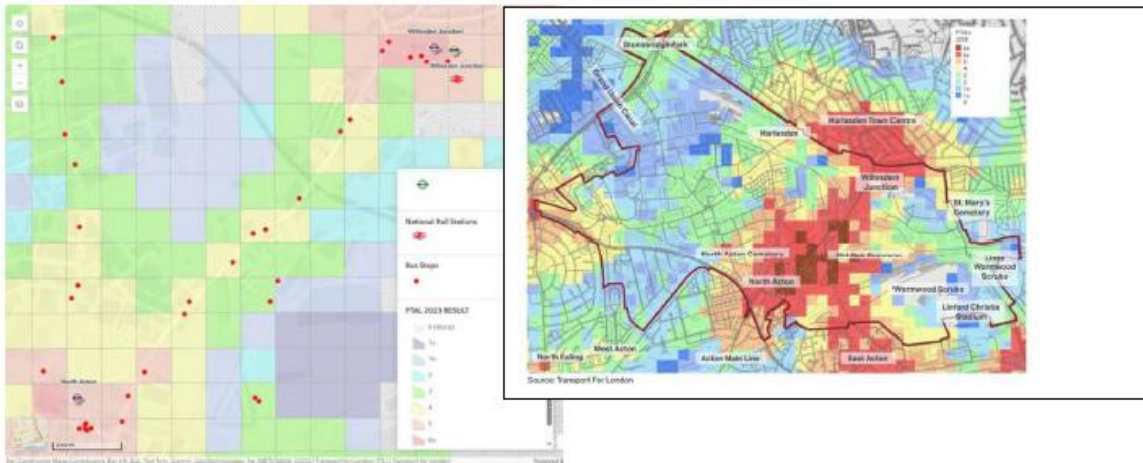
### **Travel, transport and traffic – more details on the lack of connectivity**

2.28 The ease of travel for existing and incoming residents in the designated Old Oak neighbourhood area remains poor, a legacy of a limited local road network and longish walks to either Willesden Junction or North Acton station. There have been no improvements made to local transport infrastructure, and construction activity has led to multiple road works and temporary traffic lights.

2.29 The north/south road connections of Old Oak Lane, Victoria Road and Old Oak Common Lane have long been congested. Residents continue to face the threat of a road closure of Old Oak Common Lane for up to four years from 2008 to enable HS2 bridge construction.

2.30 The Masterplan Framework includes no PTAL map in its 200 pages, a notable omission. The 2022 Local Plan includes maps of 'current' and 'future' PTAL levels (figures 7.10 and 7.11). These proved contentious at Examination stage, as the 'future' map included no forecast date and no information on the assumptions on which this version was based.

2.31 The GLA 2025 'portrait for the Old Oak and Park Royal included the 'future' PTAL map from the Local Plan (with its much improved scores) with no explanatory notes and no date. The Forum and OPDC continue to be in dispute over GLA's use of this map as part of the preparatory material for the new London Plan.

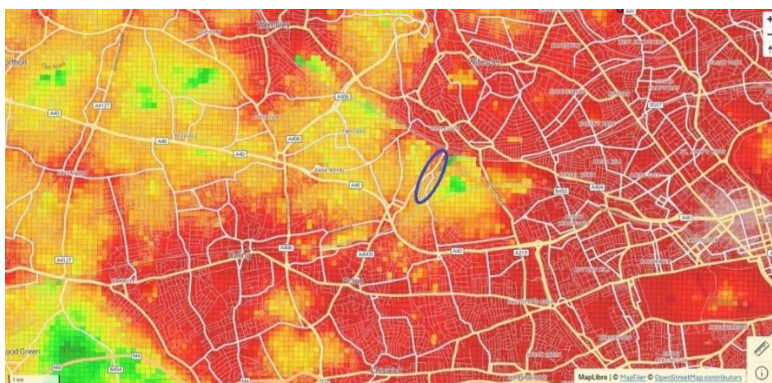


The left hand image shows current PTAL levels (from TfL's WebCat model) for the area between Willesden Junction and North Acton station, including the Old Oak project area. The right hand image shows the PTAL map used by the GLA in its 2025 'pen portrait'. Unlike other PTAL maps used in this GLA assessment, this not dated. Without information on what transport improvements are assumed (and on what timeline) the Forum views this version as dangerously misleading and as a work of fiction rather than fact. Continuing assertions by HS2 and OPDC that Old Oak is (or will soon be) a 'well connected place' are being taken up by developers and estate agents and give a false impression of the character of a part of London that is **unusually poorly connected**. And with no firm or funded plans to change this position in the next 10-15 years prior to the opening of OOC station.

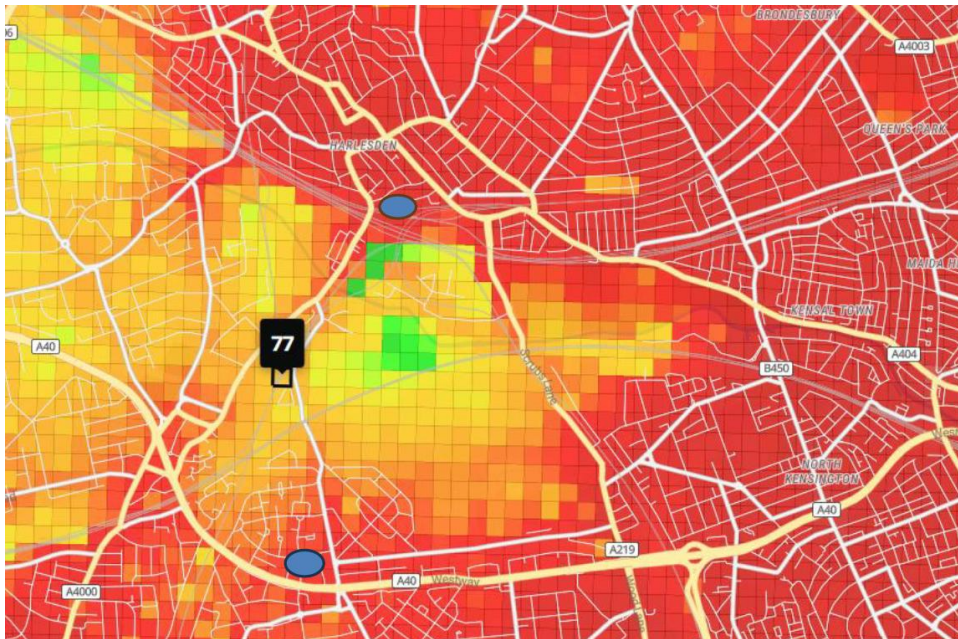
## The new DfT Connectivity Tool

2.32 As noted above, this new [mapping tool](#) has been introduced by DfT to help built environment professionals to understand how sustainably located a place is and the transport interventions needed to support it. Unlike the TfL WebCat system model, the 'sustainability' and overall score for locations measures how any location in England and Wales is connected to everyday services by walking, driving, cycling and public transport

2.33 The [Connectivity Tool Lite](#) is available for public use. As would be expected most locations in Inner London achieve high scores (the maximum being 100) as shown in red on the London-wide map below. The area in which development sites proposed in this draft neighbourhood plan is outlined in blue.



2.34 This forms part of a noticeable lower connectivity ‘isthmus shaped’ area projecting towards central London and extending from Park Royal to Kensal Town. The enlarged map below shows the two transport nodes in blue at Willesden Junction and North Acton. **The OPDC Masterplan area between is not ‘well connected’ to local amenities.**



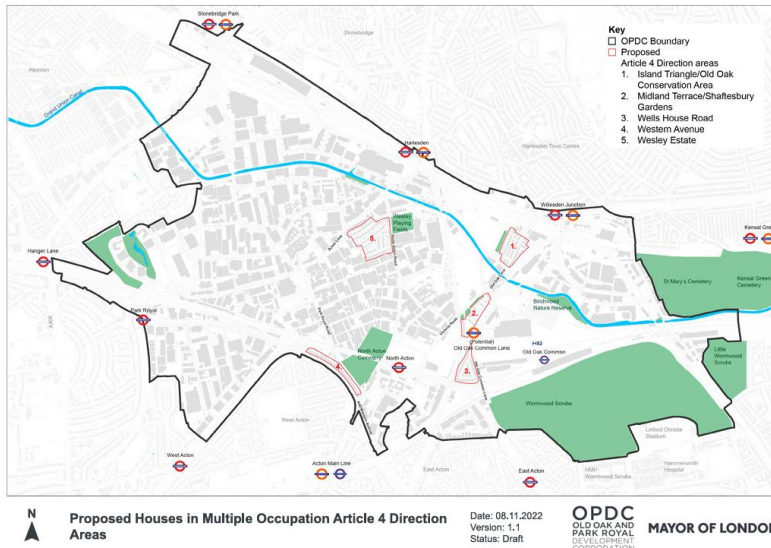
### Housing in Multiple Occupation (HMOs)

2.35 Since the start of HS2 construction works, parts of the Old Oak neighbourhood area have seen an increase in the number of HMOs. Predictably a large construction workforce includes many who wish to be housed as near as possible to the OOC station construction site. Other construction projects in the area (including several data centres) have added to demand for rented accommodation,

2.36 LB Ealing has introduced a series of policies and licensing measures aimed at regulating unlawful use of outbuildings (‘beds in sheds’) and in mitigating the harmful impact of HMOs on neighbours. The Council introduced mandatory licensing in line with new national legislation in 2018. In 2025 further steps were introduced including:

- Stricter planning controls: Landlords must seek planning permission to convert family homes into HMOs, regardless of the number of occupants.
- Mandatory Licensing extended to all HMOs, including compliance with legally enforceable standards for property management and tenant welfare.
- Impact Assessment: The council aims to balance supply and quality, ensuring that HMOs meet community needs while managing potential issues like noise and waste.
- Increased enforcement measures with dedicated enforcement officers to address complaints related to poorly managed HMOs, including inspections and warnings.

2.37 In 2022/3 OPDC consulted on and implemented an Article 4 Direction removing Permitted Development Rights for small-scale HMOs and requiring planning permission for change of use. The area covered by the Direction includes most parts of the Old Oak neighbourhood area.



Map showing the 5 areas covered by OPDC's Article 4 Direction requiring planning consent for a change of use to a HMO

## Purpose Built Student Accommodation

2.38 On Purpose Built Student Accommodation, an over-concentration of PBSA units at North Acton has been the subject of major concern for OONF. We have made objections to a series of recent development proposals involving several hundred additional units (applications from Downing and from Imperial College, both consented by OPDC's Planning Committee).

2.39 The Forum's [June 2025 submission to the GLA](#), as part of consultations on *Towards a New London Plan* include an annexe on the balance of student numbers as compared with other residents at North Acton. Our analysis of the figures differs from that used by OPDC. OPDC view a concentration of 31% as acceptable. The Forum considers that North Acton could see as much as a 50/50 split between students and other residents – a transient demographic which will not make for a successful long-term community. Hence proposed neighbourhood plan policy OONA 4.

## Data Centres

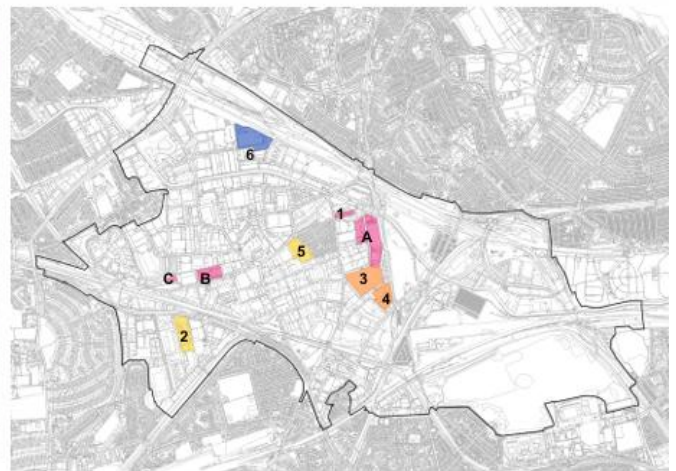
2.40 The emergence of data centres as one of the few forms of development that has seen significant interest in West London since 2015 has become a growing concern for local people.

2.41. When located in industrial areas, proposals for these buildings usually lead to few objections from the public. There is growing awareness that the operation of data centres makes huge demands on electricity and water supplies. In 2024 Oxford

Economics research showed that in west London, the cluster of data centres accounted for 18% of electricity consumption. This led to [intervention by the GLA](#) to work with electricity suppliers to mitigate a scenario in which housing starts were being held up through long delays in achieving an electricity supply. Parts of the Old Oak neighbourhood area are experiencing falls in water pressure.

2.42 This neighbourhood plan includes a policy resisting this type of use within or adjacent to existing residential areas. This reflects the range of environmental harms that data centres create, especially cumulatively within a small geographic area, and the fact that their floor- to-floor heights are far more than ordinary industrial buildings, resulting in excessive building mass in relation to their surroundings.

Site	Status	Floorspace sqm NIA	Jobs	Job density
<b>Purpose built data centres</b>				
1 37-39 North Acton Road Data Centre	Completed	13,739	90	153
2 Concord Road Data Centre	Planning permission	32,720	125	262
3 Bashley Road Data Centre	Near completion	45,014	500	90
4 Chandos Road Data Centre Phases 1A and 2	Near completion	33,872	90	376
5 Frogmore Industrial Estate Data Centre	Planning permission	27,540	50	551
6 Premier Park Data Centre	Live application	25,000	TBC	TBC
	Totals	177,885	855	
<b>Retrofitted data centres</b>				
A Equinox Data Centres	Complete - retrofit	25,000 (approx.)	Unknown	Unknown
B Equinox Data Centre LD3	Complete - retrofit	2,600 (approx.)	Unknown	Unknown
C Coronation Road Exodus Data Centre	Complete - retrofit	Unknown	Unknown	Unknown
	Total floorspace	205,485		



*Data centres in the OPD area (Source OPDC February 2026)*

2.43. When located in industrial areas, proposals for these buildings usually lead to few objections. Public awareness of the wider consequences of the operation of data centres has grown slowly, once it became apparent that the huge demands on electricity capacity was prejudicing the start of major housing schemes. In 2024 Oxford Economics research showed that in west London, the cluster of data centres accounted for 18% of electricity consumption. This led to [intervention by the GLA](#) to work with electricity suppliers to mitigate a scenario in which housing starts were being held up through long delays in achieving an electricity supply.

2.44 More recently, the fact that data centres also make heavy demands on water supply has also become more widely known. Parts of the Old Oak neighbourhood area are experiencing falls in water pressure with residents seeking clarification from Thames Water Authority as to the causes.

2.45 This neighbourhood plan includes a policy resisting this type of use within or adjacent to existing residential areas. This reflects the fact that the massing and heights of these buildings can have significant impacts (floor- to-floor heights are far more than ordinary industrial buildings). Noise from plant (generators and extracts) can also be an issue.

## CHAPTER 3 – THE CHARACTERISTICS OF THE FIVE SUB AREAS

3.1 The names ‘Old Oak’ and ‘Old Oak Common’ have become more familiar to Londoners over the past decade – mainly as a result of HS2’s promotional material on the rail interchange. But most Londoners would not be able to explain what part of the city is referred to as ‘Old Oak’.

3.2 Even now there is now some confusion over whether the name ‘Old Oak’ will in future refer to the ‘project area’ between Willesden Junction and North Acton, along with the section of f North Hammersmith around the station. Residents of the Old Oak Estate in LBHF (built in the early 20<sup>th</sup> century) are not happy that the Masterplan identifies a new ‘Old Oak Town Centre’ at a location known to date as Acton Wells and not close to their own homes.

3.3 As of 2026, a significant part of the existing residential population within the eastern part of the OPDC boundary lives within the separate residential enclaves within the Old Oak neighbourhood area. North Acton (to the south of the neighbourhood boundary) has seen a rapid growth in population, estimated now at around 5,000 residents and students living in the core area within and immediately around the Victoria Road gyratory.

3.4 2021 Census data showed 2,561 people living within the Old Oak neighbourhood area boundary.

3.5 This neighbourhood plan seeks to address the character and needs of each sub-area within the designated boundary, in the following short chapters. Brief details of the history and character of each area are given in each case.

3.6 Running from north to south these five sub-areas are

- The Wesley Estate
- The streets of Railway Cottages off Old Oak Lane (often known as the TITRA area or the Island Site)
- Atlas Road junction including the Collective building
- Midland Terrace and Shaftesbury Gardens, off Victoria Road
- The Wells House Road triangle

3.7 The area has long experienced air pollution from traffic. A 2019 piece of research by Navigus gave details of the concentration of nitrogen dioxide (NO<sub>2</sub>) recorded in 2016, with high levels along the main vehicular routes of Old Oak Lane/Victoria Road and Old Oak Common Lane. Dust from HS2 and other construction work has been a major issue for local residents for a decade now, with the prospect of further decade to come.

3.8 The physical character and fabric of each of these residential communities including the nature of the housing stock is specific to each sub-area and is described in the relevant chapter of this neighbourhood plan.

3.9 While this outcome was never planned by OPDC, the position in 2026 is that OPDC has defined a 'Phase 1' for delivery by a chosen private sector partner. This phase involves seven development sites in the northern part of the Masterplan area. These have been selected on the basis that the land involved is in OPDC control. Release dates for the HS2 construction compounds have been pushed back several times in recent years. The latest timings notified to the Forum are as below. The dates in blue are those provided by HS2 in response to a FoI request in 2022:

Victoria Road Box 2035-36 (Q4 2028)

Shield site 2035-36 (Q4 2028)

Atlas Road 2039-41 (Q2 2032 as linked to Euston construction)

Adjacent Site (next to OOC station) 2033-35 (Q4 2030)

3.10 These new dates raise questions over whether OPDC will in reality be able to ensure a continuing stream of sites for development for a JV partner, after Phase 1. Any potential PSP is likely to factor in the risks of yet further delays on site release timings.

3.11 The OPDC Position Statements include a Land Ownership plan of the Phase 1 area, as below:

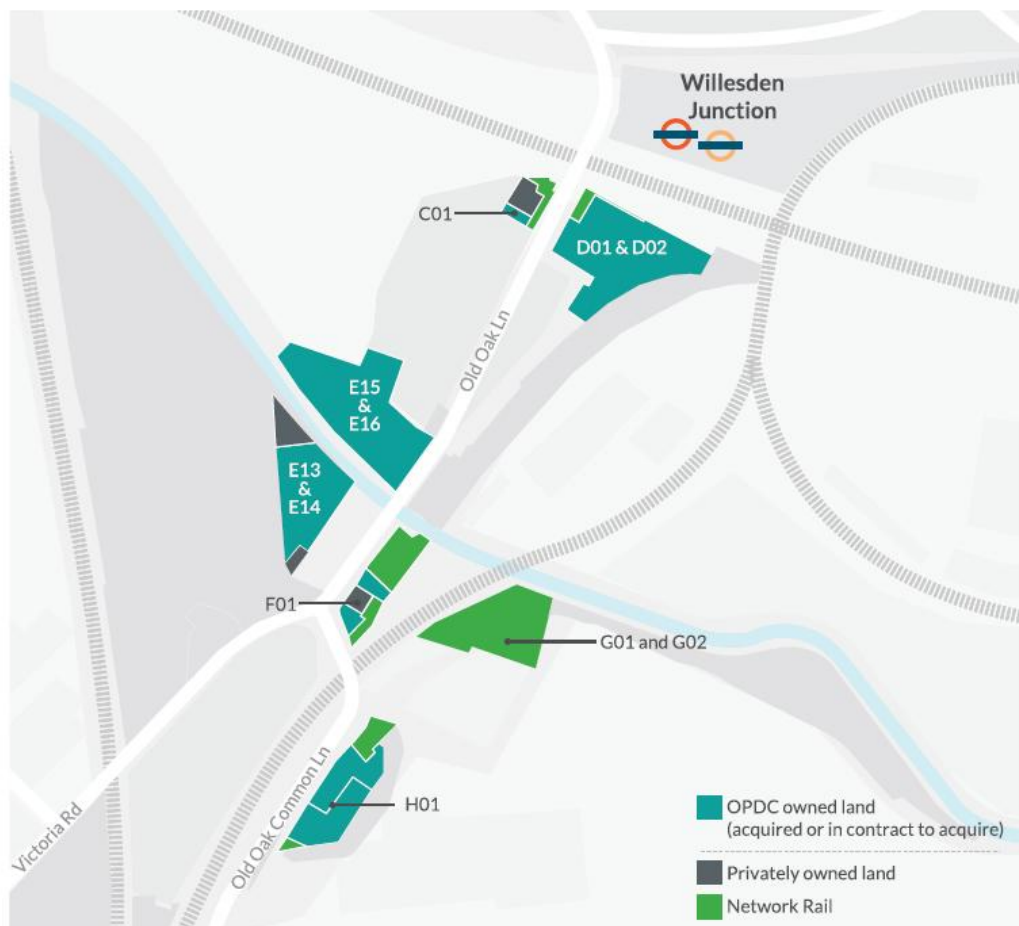
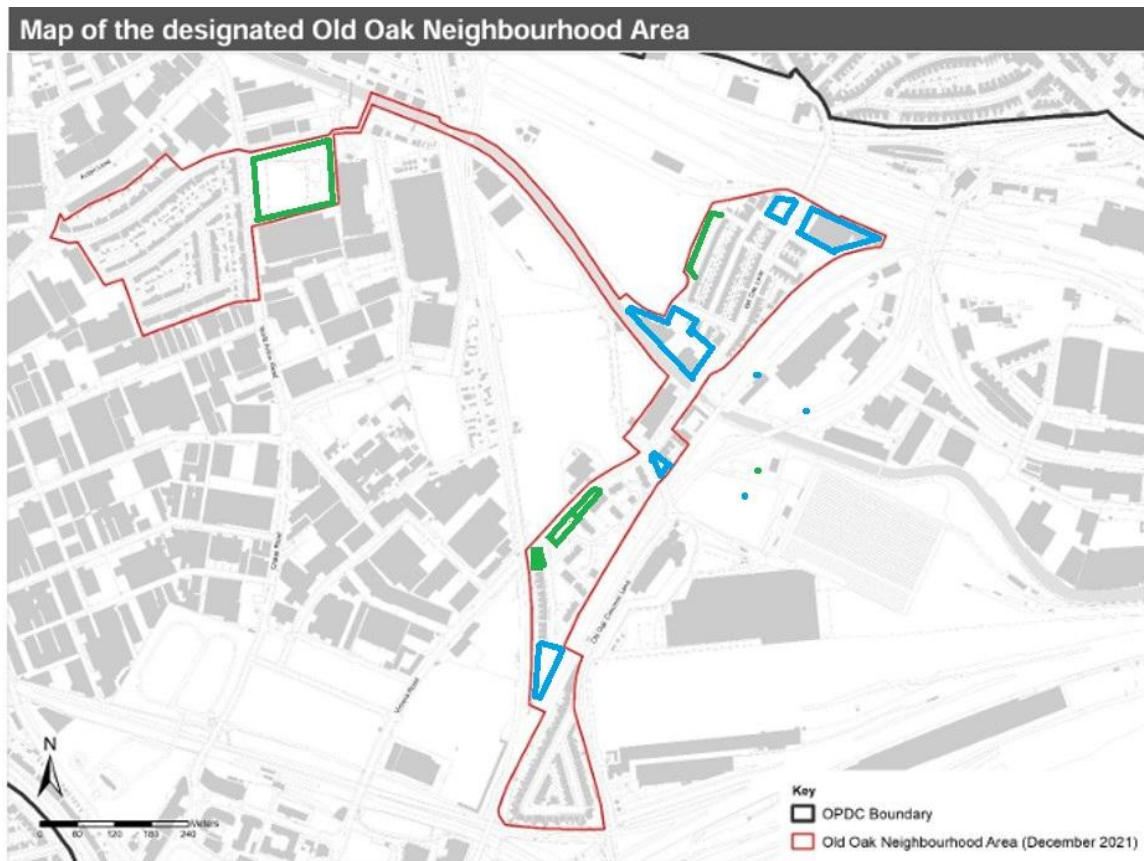


Figure 2. Land Ownership Plan

3.12 The sites proposed for allocation in this draft neighbourhood plan are shown below (with boundaries in blue). Four of them are now owned/controlled by OPDC. The position on the Goodhall Street site remains to be determined, with CPO negotiations in progress.



### Background to the updated overall vision and objectives for this Old Oak Neighbourhood Plan

3.13 The Forum’s vision for the 22 hectares of the Old Oak neighbourhood area has already been updated once from the initial draft version -- to reflect the OPDC’s ‘change of direction’ in 2019 from Old Oak North to the ‘Western Lands’. This revised Draft Plan is a third version and takes account of the 2022 OPDC Local Plan. **While the Forum acknowledges the content of the 2025 Masterplan Framework we do not accept the status now being claimed for this non-statutory document as a basis for deciding planning applications.**

3.14 We accept that the OPDC Regeneration Strategy and the 2025 Masterplan Framework provide relevant background information and ‘illustrative’ suggestions on how the Old Oak project area could be developed. But these proposals are ‘illustrations’ which OPDC has subsequently sought to present as reflecting an adopted spatial strategy which a chosen development partner is expected to ‘refine’.

3.15 The changes in OPDC’s spatial plans as compared with the 2022 Local Plan, as promoted in the Masterplan Framework, have led to some rethinking of this Draft

Neighbourhood Plan as compared with our earlier 2021 Draft. **The changed location proposed for an ‘Old Oak Major Town Centre’ in the Framework has been reflected in this neighbourhood plan.** The 2022 Local Plan Land Use Map at figure 3.7 defines an amorphous and continuous area running southwards from Channel Gate, merging a Major Town Centre into a Major Town Centre/Commercial Centre around OOC station – as shown below:



Extract from Land Use Figure 3.7 from OPDC 2022 Local Plan, showing location of Old Oak Major Town Centre and Major Town Centre/Commercial Centre (hatched area).

3.16 As commented on in our consultation responses at Regulation 19 and Post Submission Modification stages, the Forum never viewed this as a convincing concept. The proposed town centre was spread across as wide area. Achievement of the concentrated footfall needed to support major town centre uses seemed improbable. The distance from OOC station platforms to ‘major town centre facilities’ at Atlas Road/Channel Gate would have been a kilometre, along a windswept section of Old Oak Common Lane with limited scope for active frontages. Local people questioned during preparation of the Local Plan why HS2/GWR rail Elizabeth Line passengers would wish to make this walk?

3.17 Latest proposals for a major town centre at Acton Wells, as now shown in the Masterplan Framework (see below) will be seen by many as a more coherent spatial proposition. But the cluster of dense and tall buildings shown at this location in the Framework document has harmful impacts for residents in Wells House Road, Midland Terrace and Shaftesbury Gardens.

3.18 This new proposition in the Masterplan also opens up a new potential tension -- as to whether this location could attract investment in ‘town centre uses’ (and customer footfall) in the prolonged gap of time prior to the opening of OOC station. North Acton already has a retail offer and other facilities (albeit limited and weighted towards a student customer base). It is already a ‘neighbourhood centre’ with better transport connections (in the form of North Acton station) than much of the Masterplan area. Unless and until a possible new Overground station in Old Oak Common Lane is

opened (as part of the West London Orbital project) why will Acton Wells draw in major town centre uses?



*OPDC Masterplan graphic of the 'Adjacent Site' to OOC station (left) and the bridge connection to Old Oak Old Town Centre at Acton Wells. Existing buildings at the North Acton Cluster shown in white at the top of the image.*

3.19 Specific proposed policies and proposals for the sub-areas of the Wesley Estate, the Railway Cottages, Midland Terrace/Shaftesbury Gardens, and Wells House Road have been reviewed and amended in this latest Draft Plan. These are set out in the subsequent chapters.

### **Ealing's new Local Plan, OPDC Legacy Framework 2024, and Community-led Regeneration Charter**

3.20 The Old Oak Neighbourhood Forum has tracked the process of the new Local Plan for Ealing, and took part in sessions at the Examination in Public. The Inspectors report and adoption of the Plan is expected in late 2026/early 2027. One of the objectives of this neighbourhood plan is to try to ensure that a future 'major town centre' at Old Oak becomes over time a successful and sustainable addition to Ealing's existing 'Seven Towns'.

3.21 The Forum has therefore taken into account Ealing's OPDC Legacy Framework 2024. This a council-approved policy framework that sets out **Ealing's priorities, expectations, and "asks" for the long-term regeneration of the Old Oak and Park Royal area**. Ealing Council explicitly framed the strategy around long-term legacy, rather than short-term development outputs, and this document is non-statutory and advisory. Nevertheless it is intended to set out expectations of the Borough Council in the next stages of regeneration at Old Oak, with revisions every two years.

3.22 The Forum and its membership will be interested to see Ealing's response to the initial pre-submission consultation on this draft neighbourhood plan. As a body involving many long-term residents of the Old Oak area, we are always conscious of the fact that OPDC's plans currently set the rules and delivery framework for regenerating Old Oak, while Ealing Council's Legacy Strategy sets out what Ealing wants that regeneration to leave behind for its communities.

3.23 Ealing's recently published [Community-led Regeneration Charter](#) has been prepared with the aim that *developers, investors and communities can work more closely together to deliver positive, meaningful change in our local neighbourhoods*. The Charter was co-produced with the community and multiple stakeholders during an extensive engagement with local communities over a six-month period from August 2025.

3.24 One of the Charter's 15 priorities for good growth and regeneration is *Creating community governance structures to empower residents, such as resident steering groups and voluntary groups. Ensuring shared decision-making, resident-led structures, youth voice, diverse participation and joint working throughout the project lifecycle*.

3.25 Our Forum considers that its decade long efforts to influence the plans and decisions of OPDC has been an example of sustained effort to put this aim into practice. This also applies to the initiative in 2025 from a number of local residents associations and neighbourhood forums to establish the [OPDC Residents Panel](#). The agendas and minutes of this Panel are available on the OPDC website. As of mid 2026 there is a growing list of issues on which OPDC and the residents on the Panel have had to 'agree to disagree'.

## CHAPTER 4 The overall vision for the Old Oak Neighbourhood Plan

4.1 The Forum's overall 'vision' for the neighbourhood plan, set out in earlier drafts from previous years, has been reviewed and updated as follows:

**A) to seek to ensure successful integration of long-established residential enclaves with new development, moderating OPDC development and regeneration proposals which have yet to respond sufficiently to revised plans, timescales and continuing uncertainties on the impact of the HS2 project.**

**B) to achieve early delivery of mid-rise housing on the five development sites within the neighbourhood boundary at residential densities appropriate to locations on the border of inner/outer London and with a high proportion of family homes -- in the context of the local transport infrastructure likely to remain in place until the late 2030s at the earliest.**

**C) to support Ealing Council's 2024 OPDC Legacy Framework by creating is an exemplar sustainable part of London, guided by the principles of a 20-minute neighbourhood and promoting the delivery of new social infrastructure for existing and new residents.**

**D) to make use of the neighbourhood planning framework to instil the principles and objectives behind LB Ealing's [Community led Regeneration Charter](#) in OPDC's engagement with developers.**

**E) to provide development plan underpinning which could facilitate early housing delivery on OPDC land assets, helping to relieve acute housing pressures on this part of West London.**

4.2 These high-level aims are then translated into a set of eight 'objectives', recognising what is potentially achievable through planning policies along with some potential 'actions' included in this neighbourhood plan. Specific draft planning policies are then defined. A first set of NP policies is designed to apply across the neighbourhood area. These are followed by policies tailored to each of the sub-areas covered in each chapter of the Draft Plan.

**Objective 1** *To improve cohesion and integration between the sub-areas within this part of East Acton and with adjoining parts of Ealing, Brent and Hammersmith through improved connections and better access to local amenities within a 'walkable neighbourhood'.*

**Objective 2** *Through site allocations, to establish a viable neighbourhood centre at Atlas Road Junction, to serve the daily needs of surrounding residents.*

**Objective 3** *To enhance the public realm and quality of open spaces, making use of Local Green space designations, especially in these three sub-areas*

- **Wesley Playing Fields**
- **Railway Cottages/TITRA area**
- **Midland Terrace/Shafesbury Gardens**

**Objective 4** *To enable and support early delivery of new homes at densities that can be supported by the existing transport network in the area, working with the OPDC and GLA on innovative approaches to Modern Modular Construction (MMC).*

**Objective 5** *To ensure that new development encourages pedestrian and cycle movement and modal shift to sustainable form of transport, in line with 2022 OPDC Local Plan policies on Transport.*

**Objective 6** *To reduce traffic congestion in the area and mitigate where possible the continued impact of HS2 construction traffic.*

## **DRAFT POLICIES APPLYING TO OONA AREAS 1-5**

4.3 There are eight draft generic policies proposed in this neighbourhood plan, intended to apply to all of the five sub-areas within the neighbourhood boundary.

### **Policy OONA 1 – Housing density**

***Housing densities of new residential development proposed within the neighbourhood area should not exceed net residential densities of 350 units/hectare other than at locations achieving PTAL levels of 4 or above (i.e. near existing public transport nodes).***

***Reasoned justification: this overall density level reflect parameters for ‘urban’ rather than ‘suburban’ locations in the National Design Code and is towards the upper end of those used in the former London Plan Density Matrix. This policy provides for effective use of land and ‘optimisation’ in this 22ha of the Opportunity Area, but not for the ‘superdensities’ that appear to be envisaged at many locations in the OPDC Masterplan Framework. As and when this neighbourhood plan is reviewed, account will be taken of improvements in transport infrastructure that have materialised on the ground.***

### **Policy OONA 2 – Building Heights**

***OONA Area 3 at Atlas Junction is recognised as a location appropriate for tall buildings (i.e. above the OPDC definition of 15 storeys). In other parts of the neighbourhood area new Tall Buildings will be resisted unless of a height and scale, mass and volume that is proportionate to its location and in keeping with the positive character of the local context of its surroundings, including the predominant building heights.***

*Reasoned justification: to ensure that new development within the neighbourhood area is integrated with the urban grain of the existing residential settlements and to conform with London Plan Policy D9 on Tall Buildings.*

### **Policy OONA 3 – Affordable Housing**

*All residential developments to provide affordable housing at levels consistent with London Plan policies prevailing at the time and OPDC Policy H2 (which applies to those with the capacity to provide more than 10 self-contained units (or have a gross internal residential floorspace of more than 1,000 sqm) subject to viability.*

*Reasoned justification: to reflect affordable housing policies in the London Plan and OPDC 2022 Local Plan with flexibility to take account of the [MHCLG/GLA Housing Support measures introduced in March 2026](#).*

### **Policy OONA 4 – Purpose built student housing**

*In the interest of retaining a balanced community within the neighbourhood and in light of the over-concentration of Purpose Built Student Accommodation at nearby North Acton, to resist proposals for student housing developments and further co-living schemes within the neighbourhood area.*

*Reasoned justification: North Acton, near the OONA, has seen a severe over-concentration of purpose built student housing. This does not achieve a balanced and sustainable community, and where over-concentrated within an area leads to a transient population with insufficient stake in long-term quality of life in the area. The neighbourhood area already includes the Collective co-living scheme of 700 units.*

### **Policy OONA 5 – Houses in Multiple Occupation**

*In those parts of the neighbourhood covered by OPDC’s Article 4 Direction on HMOs applies (areas 1,2,3 and 5) to resist such applications unless clear evidence can be provided (and included in planning conditions) to avoid harms from inadequate room sizes, waste storage, parking provision, noise, overcrowding, or parking stress.*



*Reasoned justification: the construction workforce required to build the HS2/QE Line interchange has already created unusually high demand for low cost privately*

*rented accommodation. Coupled with extended planning blight preventing house sales this is leading to transfer of existing housing to poor quality HMO accommodation inadequately managed by landlords to the detriment of quality of life for neighbours.*

#### **Policy OONA 6 – Data Centres**

*Applications for new or expanded data centres within or proximate to the neighbourhood area will be supported only where they accord with OPDC and London Plan policies on Strategic Industrial Location (SIL) and meet all criteria at A to F below.*

*Within the Old Oak neighbourhood area, priority will be given to employment-generating and mixed-use development. Data centre proposals must demonstrate that they represent an appropriate use of land in this context.*

*A) Demonstrate confirmed access to sufficient electrical capacity without constraining supply to existing or planned development;*

*B) Achieve the highest feasible carbon performance and minimise operational emissions;*

*C) Integrate in terms of building height and massing with any neighbouring residential areas.*

*D) Demonstrate that clustering will not give rise to unacceptable impacts in terms of energy and water demand, infrastructure capacity, existing urban character and environmental quality.*

*E) Demonstrate that impacts relating to air quality, noise, vibration and water use are acceptable;*

*F) Be supported by a full Environmental Impact Assessment where a data centre is proposed to be located close to existing residential streets.*

*At present, there are no locational policies on data centres within the London Plan or 2022 OPDC Local Plan. Local Plan Policy EU7D supports data centres ‘where circular economy principles have informed the design and implementation of energy (including heating and cooling), water and waste infrastructure). This NP introduces a set of more specific policies because the neighbourhood area is already surrounded by a significant cluster of data centres (see map and table on page 24).*

#### **Policy OONA 6 – Construction Activity**

*Development proposals should be designed in a way that minimises their impacts on amenity, public health and the environment through dust and emissions, light pollution, noise and vibration during deconstruction and construction. Appropriate mitigation for such impacts will be sought through the use of planning conditions, use of Construction Management Plans or section 106 agreements.*

*Reasoned justification: Existing residential areas within the neighbourhood area have been severely affected by intensive levels of construction activity. Whilst OPDC are the local planning authority for the area, powers to enforce on a wider range of environmental issues remain with the local councils. In general, OPDC cannot enforce on the following*

- *noise and disturbance*
- *air quality matters e.g odour, dust and smoke*

#### **Policy OONA 7 – Enabling Active Travel**

*New development should provide new or improve existing infrastructure and facilities which support and encourage safe active travel to assist cyclists and pedestrians and thereby encourage more cycling and walking*

*Reasoned justification: the existing road network in the OONA is already very congested with no early improvements committed to date’, An objective of this neighbourhood plan is to encourage modal shift to cycling and walking.*

#### **Policy OONA 8 – Healthy Air**

*Development should not damage the health of the air by increasing emissions of harmful pollutants and should aim to be at least ‘air quality neutral’ and not cause or contribute to worsening air quality. On major development this should be demonstrated through an air quality assessment and, if necessary, proposed mitigation measures.*

*Reasoned justification – scope for such NP policy to be discussed with OPDC, given limits on powers*

These eight policies applying across the neighbourhood area are framed so as to assist the achievement of the broader objectives within this neighbourhood plan.

## CHAPTER 5 OONA SUB-AREA 1 THE WESLEY ESTATE

5.1 The estate is an area of 1930s houses built originally as company housing by stationery manufacturer Harold Wesley, with these properties subsequently sold to private owners. There are 230 houses, mainly two storey and semi-detached, laid out in a typical suburban pattern of the period.

5.2 This part of the OONA is isolated from other residential areas by industrial premises in Park Royal and North Acton Road, in Harold Road, Newark Crescent and Wesley Avenue and by the Grand Union Canal to the north. Residents in the estate currently lack easy access to basic facilities (GP surgery, opticians).

5.3 In other respects the estate provides good quality low rise housing with higher space standards than would be built today and remains a popular residential area.



*Wesley Estate showing the 2021 neighbourhood boundary in blue, lying within Park Royal and isolated from other residential areas*

5.4 Wesley Playing Fields are located on North Acton Road. This area is designated by LB Ealing as a small open space and totals 1.59 hectares. This is the largest green space lying within the Old Oak neighbourhood area.

5.5 The history of this green space reflects the history of Park Royal which by the early 1930s, had become one of the most dynamic industrial zones in Greater London. Harold Wesley, whose stationery manufacturing firm was among the area's most respected employers, recognised the need to ensure that his staff were not only well housed but had access to local amenities as part of a long-term community.

5.6 The donation of land for the Wesley Playing Fields in 1931 is a legacy from this period of enlightened employers. The green space has hosted community sports days, school gatherings, and local fêtes s recorded in local oral history. Local residents have worked with LB Ealing to protect the open character of the Fields while enhancing their use for education, sustainability, and public well-being.

5.7 The space meets all three of the criteria for designation as a Local Green Space, which have remained unchanged in the NPPF since 2012 (now Policy HC2 in the 2025 Draft NPPF at page 74). This neighbourhood plan therefore proposes LGS designation, via Policy OONA 1A below.



### *Wesley Playing Fields*

5.8 The Wesley Estate is not designated as a conservation area. However, it is subject to planning restrictions due to its historical significance and community value. These include OPDC's Article 4 Direction removing permitted development rights for HMOs, from which the estate has suffered harm in recent years from a growing number of applications to convert the suburban-style houses. In December 2023 OPDC introduced an Article 4 Direction with the effect of removing permitted development rights for change of use from 'Use Class C3: dwelling house' to 'Use Class C4: house in multiple occupation'. This change of use now requires an application for planning permission. Proposed NP Policy OONA 5 resists further HMOs in the area covered by OPDC's Article 4 Direction.

**Frogmore industrial estate** .9 OPDC’s Planning Committee in July 2022 granted outline planning consent to a data centre (Class B8) of up to 35,000sqm on the small Frogmore industrial estate immediately adjacent to the Wesley Estate (the site shown in red on the map below).



5.10 At the time, facing many development proposals in the area, local residents did not appreciate the potential scale and impact of this proposal. At Stage 1 the GLA advised that the application did not comply with London Plan policies, including the fact that *the site is not identified as suitable for a tall building as required by Policy D9 of the London Plan. GLA officers will consider this issue of non-compliance at the Mayor’s decision-making stage having regard to the public benefits of the scheme and other material considerations.* The GLA Stage 1 report noted *The proposed maximum height for the building is 40 metres.*

5.11 The GLA Stage 2 decision referred the final decision back to OPDC as the local planning authority in August 2022. A final decision notice on this outline application was issued by OPDC on 13 October 2022. This required an application for Reserved Matters to be submitted within 3 years from this date. Such an application was submitted on 9<sup>th</sup> October 2025. It was refused by officers acting under delegated powers on the 10<sup>th</sup> April 2026.

5.12 The site has been sold on to data centre provider KAO. Pre-application consultation on a new set of proposals is underway.

5.13 In light of this history, the Forum considers that the neighbourhood plan should include a specific policy on views from the Wesley Estate. This is to provide greater

protection against buildings of excessive mass and height on this sensitive site in a residential area.

**Policy OONA 1A -*To designate as Local Green Space the Wesley Playing Fields***

*Reasoned justification – While this area is designated by LB Ealing as a small open space, designation as Local Green Space under the NPPF will provide greater planning protection for a longstanding amenity space that is valued by local residents*

**Policy OONA 1B – *To resist proposals of significant mass and height at the Frogmore Industrial Estate, which is not a location identified as suitable for Tall Buildings and which lies immediately adjacent to the residential streets of the Wesley Estate***

*Reasoned justification – to protect the existing residential context of the Wesley Estate from inappropriate development, on a site which is not identified in the Local Plan as suitable for Tall Buildings and where such development would be contrary to London Plan Policy D9 Part B.*

## CHAPTER 6 OONA SUB-AREA 2 THE RAILWAY COTTAGES/TITRA AREA

6.1 This sub-area on Old Oak Lane lies to the south of Willesden Junction and is known locally as the 'Railway Cottages' or 'The Island Triangle' or TITRA (from The Island Triangle Residents Association). The streets include around 200 late Victorian workers cottages, built in 1889 by the London and North Western Railway for its employees. Stephenson and Goodhall Streets run north south parallel to Old Oak Lane, on the western side. On the eastern side two mews streets run east west.

6.2 The housing was laid out as 'through terraces' with regular street fronts contrasting with narrower and more informal back alleys. A railway institute and mission church and school were also originally provided. These streets make up what is now a rare surviving example in London of late 19<sup>th</sup> century planned workers housing.



*Railway Cottages/TITRA sub area with 2021 neighbourhood boundary shown in blue*

6.3 The area was designated by LB Ealing as the Old Oak Conservation Area in 1982 and extended in 1990 and 1994. A Character Appraisal and a Management Plan were published in 2007, with input from the Island Triangle Residents Association (TITRA) and Ealing Civic Society. As stated in the Conservation Area Appraisal (paragraph 26) *The character of the CA is largely if not wholly reliant on maintaining the outward appearance of the estate as little unaltered as possible.* The Conservation Area boundary is shown below.



*Old Oak Lane Conservation Area boundary shown by brown line*

6.4 This community at Old Oak Lane has a strong identity, with many residents having chosen to move into the streets because of their historic and unusual character. As a rare remaining example of terraced workers housing, the area has long been used for filming. In 2021, the Island Triangle Resident's Association (TITRA) created the first annual [free film festival](#) for local residents to celebrate a long history and continuing history of British television and filmmaking in these streets, with funding from OPDC Heritage grant for small projects.

#### **Current planning policy context**

6.5 This is the only conservation area within the Old Oak neighbourhood boundary. Despite the presumption in CAs in favour of retaining building and structures (and strong objections for local residents, OONF, and a ward councillor) Ealing Council's Planning Committee on 20 May 2020 granted planning consent to a nine storey housing development at the northern end of Goodhall Street, just outside the CA boundary.

6.6 This application had been delegated by OPDC to LBE under the Scheme of Delegation entered into between the two planning authorities at the first meeting of the OPDC in April 2015. Under this scheme, decisions on more major applications (and all schemes at North Acton) were delegated. The terms of the scheme have since been revised.

6.7 The site involved lay on the CA boundary and at that time remained designated as SIL. This and the adjoining small group of industrial units were de-designated from SIL via adoption of the 2022 OPDC Local Plan. This development has impacted significantly on the character of the area, harming its previous unusually rare and homogenous Victorian character.



6.8 Proposals for other smaller scale residential developments in the TITRA/Railway Cottage sub-area have since been floated but none have progressed to implementation. Proposed policy OONA 2A is to designate the whole sub-area as a Local Area of Special Character (LASC).<sup>5</sup>

6.9. In the adopted Local Plan, these streets form part of *Place P8 Old Oak Lane and Old Oak Common Lane*. Local Plan paragraph 4.143 notes *The OPDC heritage themes seek to ensure new development reflects the existing and evolving local character in terms of their design, use and operation*.

6.10 The area has a well-established strip of community garden, known as the Woodland Garden, at the rear of the houses on Stephenson Street. Maintenance is organised by the TITRA residents association. Paragraph 4.141 of the Local Plan refers to this as one of several potential examples where small open spaces can contribute to the 30% open space requirements set out in Policy SP8. This neighbourhood plan proposes Local Green Space designation for this land, via Policy OONA 2B.

## 2020 Local Plan Policy

6.11 The 'vision' for ODPC Local Plan policy P8 states that *this part of the OPDC area will be a place that mediates between comprehensive mixed use redevelopment and industrial intensification*. The Forum and this neighbourhood plan support this vision and prior to the 2019 OPDC 'change of direction' argued for a 'mixed use buffer zone' between intensive housing development at Old Oak North and the industrial nature of Park Royal Both the Local Plan and the Old Oak West SPD propose a new 'Channel Gate Street Road' as shown in Local Plan diagram Figure 4.27 below

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<sup>5</sup> LASCs are local form of heritage area designation based on the architectural and/or historic interest of an area. They complement national designations like conservation areas, which have a higher threshold for designation.

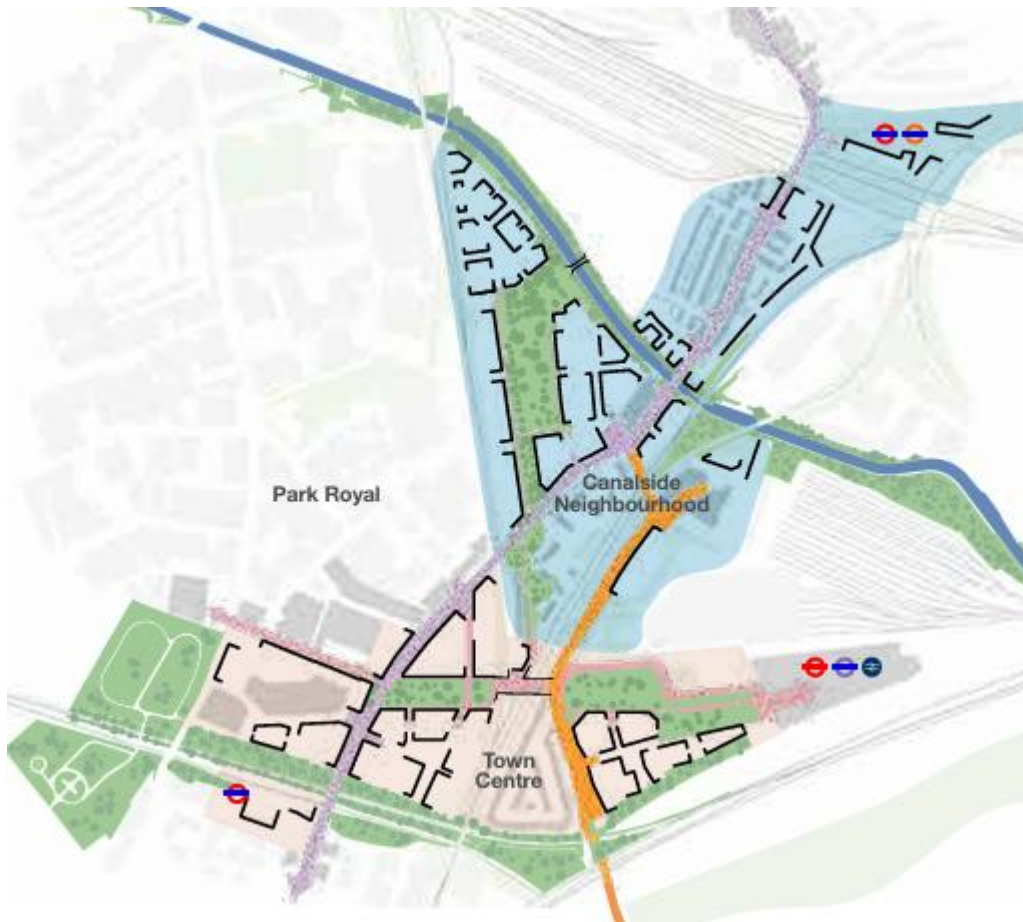
Figure 4.32: Channel Gate Place



6.12 The north-eastern part of the Atlas Road/Channel Gate (the Willesden Freight Depot) was always destined to be last of the four DfT/HS2 construction compounds to be released for development. This is because of its role in storing materials and tunnel segments, conveyed via a service tunnel to the OOC station site. This role is due to be continued during the construction of the OOC to Euston tunnel and potentially the construction of a Euston terminus also. For several years, HS2 advised our Forum of a 2032 date for release of the site, but the potential overall period for use of the rail head and freight depot now extends for longer. The latest date provided by HS2 for release of this site is 2039-41 (information as of June 2026).

### The Masterplan Framework and the ‘Canalside Neighbourhood’

6.13 The 2025 Framework document introduces a new concept of **One place, two neighbourhoods** at Chapter 4.6, with the two areas rebadged and given new names (for the third time since the 2018 Submission Version of the Draft Local Plan). These two areas are described as *a canalside neighbourhood and a major urban centre*. The Masterplan Framework document makes no acknowledgement that this is different spatial plan to that in the Local Plan.



*'One Place two neighbourhoods' diagram from 2025 OPDC Masterplan Framework*



*Image from Masterplan Framework looking north along Goodhall Street*

6.14 The former SIL sites at the northern end of Goodhall Street (now de-designated) are proposed for mixed use redevelopment in the OPDC Local Plan. This neighbourhood plan supports this use but seeks new housing that integrates better with

the existing housing than the example of 80 Goodhall Street. Hence Draft Policy OONA 2A below.

6.15 The Masterplan Framework suggests (at 6 in the image above) that development *should sensitively form thresholds at both ends of the conservation area with pairs of mid-rise buildings to create points of arrival and transition along the Mile*. Again no definition is given of ‘mid-rise’ heights. Hence Draft Policy OONA 2F below.



Numbering relates to text at page 149 of Masterplan Framework document.

This illustration includes tall buildings (shown as 2) at the eastern tip of the Ursula Lapp site and also on the northern side of the rail lines at Willesden Junction. Neither of these locations are identified as suitable for tall buildings in the 2022 OPDC Local Plan and this neighbourhood plan should not be read as endorsing these proposals. They are contrary to Policy D9 in the London Plan.

## Masterplan proposals for an ‘Old Oak Mile’


6.16 Local residents in this Railway Cottages/TITRA sub area are puzzled by (and seek clarity on) the introduction in the Masterplan Framework of a new concept – the ‘Old Oak Mile’. The northern section (the existing Old Oak Lane) is described as follows (page 141): *The Mile will be the primary urban spine of the Neighbourhood Centre, bringing together varied uses within a clear and legible townscape. Its built form should establish a strong sense of place by:*

1. *choreographing a sequence of markers and corners to define the Mile and create key moments of arrival.*
2. *setting a consistent low-rise shoulder to give clarity to the street and purpose to taller elements.*

6.17 Page 149 of the Framework sets out an intention to *repair the severance created by Old Oak Lane, which dissects the conservation area, through coordinated development*

on both sides that strengthens the relationship with the railway cottages and reinforces a local loop connecting the neighbourhood. This 'loop' is shown in the diagram above.

6.18 The thinking of the OPDC Delivery team has become clearer following the launch of the Procurement exercise for a private sector partner. As part of the tender documentation a 'Position Statement' includes proposals for development site newly titled **Plot F01 Victoria Terraces Cluster**:

<b>Plot F01: Victoria Terraces Cluster</b>	
<p><i>View looking north along the Old Oak Mile with Victoria Terrace Cluster to the right</i></p> 	<p>Set at the heart of the new neighbourhood centre, where the Old Oak Mile meets the Grand Union Canal, this site provides the opportunity to establish a distinctive two-sided high street. Active ground floor frontages and enhanced public realm, including improved footways, cycle routes and planting, will create a more pleasant pedestrian experience, and support everyday life.</p>
<b>Size</b>	0.9 acres, 0.4 ha
<b>Indicative capacity (units)</b>	170
<b>Indicative max height (storeys)</b>	18
<b>Land ownership summary</b>	OPDC, NR and private ownership
<b>Connectivity</b>	Willesden Junction- 0.6km North Acton- 0.9km

While parts of this site feature in the map and Site Allocation table in the 2022 OPDC Local Plan as Site 21 Willesden Junction Maintenance Depot and as a small section of Site 26 Channel Gate the concept of a 'two-sided high street' with buildings up to 18 storeys is a new feature introduced in the Masterplan. There has been no public consultation this new 2026 proposal and the 2026 'Position Statement' has been made available to developers but not published by OPDC. The site does not feature on the map for Policy SP9 (Figure 3.15: Sensitive Locations and tall building locations) in the Local Plan. **These proposals will be opposed by OONF as being contrary to London Plan Policy D9 on Tall Buildings and to the 2022 OPDC Local Plan.**

This is one of several 'departures' from Local Plan policy included in the Masterplan Framework on which local residents are understandably confused. The jargon used in the Framework document does not help.<sup>6</sup>

<sup>6</sup> The language and vocabulary of the Masterplan Framework document employs terms which are widely used by planning consultants acting for developers in attempts to justify high rise and high density buildings. These include frequent references to buildings as 'markers', enhancing 'wayfinding', and 'moments of arrival'. This should not be the language coming from a local planning authority, which needs to justify tall building locations on sounder and objective criteria in accordance with London Plan Policy D9.


6.19 The Masterplan Framework suggests (in respect of point 6 in the image above at Goodhall Street) that new development *should sensitively form thresholds at both ends of the conservation area with pairs of mid-rise buildings to create points of arrival and transition along the Mile*. Again no definition is given of ‘mid-rise’ heights and local people are unimpressed by the suggested need for ‘*points of arrival and transition*’. Hence Draft Policy OONA Policy 2F below.

## The Lords site

6.20 The area on the north side of the canal at Channel Gate (known as the Lords site) is one of those development sites now acquired/controlled by OPDC that lies within the boundary of the designated Old Oak neighbourhood area. The site was the subject of advanced proposals for a mixed use scheme with 360 homes from developers Gempoint in 2023. The site was acquired by these developers for £2.3m in October 2022.

6.21 OPDC acquired control of the site as part of its Land Assembly programme. It is not known what sum was paid (Land Registry data says only ‘over £1m’).

6.22 Thee 2026 OPDC Position Statement includes this site as **Plots 15 and 16 Lords**

Plots E15 and E16 Lords	
<p><i>View looking south along Goodhall St towards the Lords site (with the canal beyond)</i></p> 	
Occupying a prominent position on the canal's north bank and linking with the historic Old Oak Lane Conservation Area, the site unlocks a new stretch of publicly accessible waterfront. Activated by ground floor commercial spaces, this frontage will become a lively destination and a key anchor in the evolving Canalside community.	
<b>Size</b>	2.2 acres, 0.9ha
<b>Indicative capacity (units)</b>	90
<b>Indicative max height (storeys)</b>	8
<b>Land ownership summary</b>	OPDC
<b>Connectivity</b>	Willesden Junction- 0.5km North Acton- 1.0km

6.23 This is the one site within the OPDC Masterplan Phase 1 proposals here the thinking of the Development Corporation and the neighbourhood forum may prove to be aligned. An indicative maximum height of 8 storeys on this stretch of the canal will have some impact on views from the Old Oak Conservation area (TITRA streets), but is in line with 2022 Local Plan policy.

6.24 In terms of net residential density, it is not clear how much commercial or non-residential floorspace is envisaged in the Masterplan Phase 1 proposals. Assuming a 25% deduction from the gross site area, a net residential density for 90 housing units on

the site would be around 133 units/hectare. This is significantly lower than figures for other 'Phase 1' sites. But confusingly the OPDC Indicative Housing Requirement figure issued to OONF by OPDC is for 158 housing units, very different from the 90 shown in the Position Statement. This discrepancy will be explored with OPDC.

6.25 In relation to the Lords site, this neighbourhood plan proposes a site allocation and policy parameters in Policy 2D below. Background on the 2022 Gempoint proposals is given below.



## The Lords site

Proposals from Gempoint consulted on in 2022. Site bought for £2.3m by Gempoint 2000 (a company linked to Lords).

Plans modified to reduce housing units from 450 to 360 and heights from 26 storeys to 16. No planning application was submitted.

OPDC took control of Old Oak Wharf Holdings Ltd in February 2024.

*Slide discussed at the OONF and GUA meeting in October 2025. The Masterplan Framework images suggest building heights by the canal that would be lower than the 16 storeys proposed by Gempoint. The Masterplan refers to four-storey shoulder heights facing the conservation area and an illustration at page 153 shows 8 storey blocks along the canalside.*

## The Ursula Lapp site

6.26 This major development site also lies within the neighbourhood area boundary and is included in the Phase sites included in the OPDC 2026 Position Statement and tender documentation.

## Ursula Lapp Estate, Old Oak Lane



Land Registry title shows OPDC having acquired the site in April 2024 for £20,075,000.

*Slide discussed at the OONF and GUA meeting in October 2025. This site lies on the Ealing side of the Borough boundary and was not designated as SIL prior to the 2022 OPDC Local Plan. Hence it has long been high value land in commercial use. It is not the subject of a site allocation in the Local Plan but is referred to in the 2021 Development Capacity Study. It lies within the Channel Gate Place and Cluster Vision.*

6.25 Online [market information](#) suggests the site value has fallen by £1.284m since its acquisition by OPDC in 2024.

6.26 The OPDC Housing Requirement capacity figure for this site is for a minimum of 250 homes. This is the same figure as shown in the 2026 OPDC Position Statement (see overleaf). Assuming a 40% reduction in developable space for housing (given plans for significant commercial and non-residential use, we consider that this would lead to a net residential density of 417 units/hectare. Most of the site has a PTAL score of 3 with the part fronting onto Old Oak Lane achieving PTAL 4.

6.27 Given these middling levels of access to public transport, we consider a level above 400 units/hectare to be excessive. This is above the maximum 405 in the former London Plan Density Matrix for the most 'central' urban sites with best possible levels of access to a Tube/Overground/rail station (PTAL 6a and 6b). **Hence Policy OONA 2E resists development at net residential development levels above 350 dwellings/hectare on this site.**

6.28 The illustration above for 'Lane Quarter' at page 149 of the Masterplan Framework includes a note at 2) saying '*locate taller massing along the railway edge, with the tallest element positioned furthest away to relate to future development at Willesden Junction while minimising impact on conservation area character*'.

6.29 This image below from the Masterplan shows in the foreground a very sizable and tall building at the eastern tip of the Ursula Lapp estate (confusingly this image and a number of others in the document are shown with south rather than north at the top of the page i.e upside down from normal maps). **The location shown with a tower building in the Masterplan Framework is not identified as a suitable location in the 2022 Local Plan and such a development would be contrary to London Plan Policy D9 Part B.** The OPDC JV may therefore need to await the next Local Plan before a building of this height at this location would be policy compliant.



*Section of image of Canalside Neighbourhood from page 150 of Masterplan Framework. Suggested tower building is a lower left of image. No information on building height or housing density given in this document which is not part of the statutory development plan.*

### **Proposed neighbourhood plan policies for OONA Area 2 (Railway Cottages/TITRA).**

#### **6.30**

The sites and other areas referred to in these proposed policies are all shown on the map of the sub-area, as below



:

**OONA POLICY 2A – to designate the land to the north of Goodhall Street and east of Old Oak Lane as a ‘Local Area of Special Character’ (LASC) within which new development which fails to respect the character and heritage of the Old Oak Conservation Area will be resisted.**

*Reasoned justification: the land north of Goodhall Street has been in industrial/commercial use and was de-designated from SIL via the 2023 OPDC Local Plan. Remaining areas proposed for LASC designation are already within the CA boundary. New mixed use development on these sites will be bordering directly on a Conservation Area and needs to take account of OPDC Local Plan Policy D7 on Heritage. D7(b) states ‘OPDC will give great weight to the conservation and enhancement of the significance of designated heritage assets, including their settings’.*

**OONA Policy 2B – to designate as Local Green Space the Stephenson Street Community Garden known locally as the Woodland Garden**

*This community garden, maintained by The Island Site Residents Association, is long established and recognised at Paragraph 4.141 of the Local Plan refers to this as one of several potential examples where small open spaces can contribute to the 30% open space requirements set out in Policy SP8.*

**OONA Policy 2C - to allocate the OPDC owned site at Goodhall Street, as shown on the map above, for mixed use with housing at a maximum net residential density of 300 units/hectare, providing workshop space at ground floor level and retaining existing commercial uses of demonstrable benefit to the local community. Maximum height of 8 storeys or 20.5m.**

*Reasoned justification: this site was designated from SIL in 2024 and has well-established commercial uses valued by local people. The Old Oak Neighbourhood Forum supports Local Plan policy of introducing mixed use and providing additional housing, provided that this is balanced with continuing to provide local employment and retaining local services of high value to the community such as garages and vehicle repairs. The site has a PTAL level of 5 and is adjacent to a Conservation Area. The Housing Requirement figures assume 42 new homes but this is for part of the site only. Policy OONA 2C sets a maximum net residential density of 350 units above E1 commercial space and a 8 storey height limit (23m)*

**OONA Policy 2D – to allocate the OPDC owned site known as Lords Building Merchants on Old Oak Lane, as shown with a brown boundary on the map above, primarily for housing use with social and community uses at ground floor level and E1 use on Old Oak Lane and Goodhall Street frontages at a maximum net residential density level of 200 units/hectare and with building heights limited to 8 storeys or 23m.**

*Reasoned justification: this policy reflects Principle P9 Place and Cluster Vision in the Old Oak West SPD and Site Allocation 26 Channel Gate in the 2022 OPDC Local Plan. This latter site allocation is for 3,100 new homes over the 20 year plan period 2018 to 2038. The 350 units/hectare proposed maximum reflects the site’s current PTAL level of 3 with a small section of 4 on Goodhall Street/Old Oak Lane and will be reviewed in successive versions of this neighbourhood plan if new transport infrastructure comes onstream. OPDC Local Plan Policy T4B requires car-free development for residential developments located in existing or planned areas with PTAL between 4 and 6B. Hence this site is not suitable for car-free high-rise housing as proposed in the Masterplan and OPDC 2026 Position Statement..*

**OONA Policy 2E – to allocate the OPDC owned site at the Ursula Lapp Estate, Old Oak Lane primarily for housing use, with social and community uses at ground floor level and E1 use on Old Oak Lane at a maximum residential density of 350 units/hectare and with provision for Tall Buildings on those parts of the site adjoining rail lines and furthest from the Old Oak Conservation Area boundary.**

*This is a new site allocation following acquisition of the site by OPDC in 2024. The 350 units/hectare limit the sites current PTAL levels of 3-4 and will be reviewed in*

*successive versions of this neighbourhood plan if new transport infrastructure comes onstream. The site has some locations suitable for tall buildings subject to design that minimises harmful impacts on the Conservation Area.*

**OONA Policy 2F – To resist the introduction of large-scale and/or tall buildings on both sides of Old Oak Lane within or adjacent to the Conservation Area boundary unless these are justified with reference to Place Policies within the 2022 adopted OPDC Local Plan.**

*Reasoned justification: The 2025 Masterplan Framework and 2026 OPDC Position Statement introduces proposals on sites along Old Oak Lane in this neighbourhood sub-area which wholly depart from/are contrary to the content of the 2022 OPDC Local Plan. This neighbourhood plan policy responds to the fact that the Framework is not a development plan document and that Old Oak Lane runs through the Old Oak Conservation Area with its very different and historic building typology.*

## CHAPTER 7 OONA SUB-AREA 3 – ATLAS ROAD JUNCTION

7.1 The concept of the Atlas Road junction as a new ‘neighbourhood hub’ was one suggested by members of OONF in the first round of OPDC consultations on the Regulation 18 version of the OPDC Local Plan. This took place in early 2016. The Forum welcomed the fact that this idea was carried through into the Regulation 19.2 version. The existing residential enclaves within the neighbourhood boundary have long lacked access to adequate local amenities in terms of convenience shops, a pharmacy, a post office, or choice of cafes and restaurants.

7.2 The opening of the Collective building in 2017 brought to the Atlas Road junction a new community, living in a co-ownership housing scheme of 700 privately rented studios. As part of the building a smallish supermarket opened, and the Collective’s café/restaurant provided a valued addition to the area. This has since closed and re-opened over time, with the original owners of the Collective going into administration during Covid lockdown (when the communal spaces in the building could not be used).

7.3 The Oaklands Rise development (605 flats with some managed by Notting Hill Genesis and other private) brought new prospects of activated ground floors and new facilities. The subsequent reality has been that these parts of the building have remained vacant since the development opened in 2022.

7.4 The potential future of this part of the Old Oak neighbourhood area is now very different from when the neighbourhood boundary was drawn up and designated by OPDC in 2017. This area subsequently was covered by the 2024 Old Oak West SPD. As ‘policy guidance’ this document attempted (through a set of ‘principles’) to retrofit greater spatial coherence to an area previously defined as parts of four separate ‘Places’ in the 2022 Local Plan.

7.5. The more recent 2025 OPDC Masterplan Framework and 2026 OPDC Position Statement shows OONA sub-area 3 as the southern part of the proposed ‘Canalside Neighbourhood’ in OPDC’s latest *One Town – two neighbourhoods* concept. Unsurprisingly those living in the area have found it hard to keep up with these changes in the spatial plans for Old Oak, particularly with the introduction of new names or titles for existing streets and locations (‘*Old Oak Mile*’, ‘*The Common Cut*’ and the ‘*Old Oak Line*’). It is not clear what purpose these new titles serve.

7.6 Aside from confusing name changes and queries on plans for the northern part of the ‘Old Oak Mile’ (addressed under sub-area 3) this neighbourhood plan supports the Masterplan proposition of ‘Atlas Village’ as a *neighbourhood centre, with a wide range of public uses, forming the thriving community-focused heart of the Canalside Neighbourhood* (page 140 of Framework). This takes proposals back to what local residents were arguing for in 2016. The Forum was unconvinced by the 2019-22 PSMDLP Modifications which defined Atlas Junction as part of a ‘major town centre’ at Channel Gate.

7.7 What has changed radically in the past decade is the timeline for the release of the DfT/Hs2 construction compounds at Atlas Road/Channel Gate. It has never been clear why HS2 in 2022 carried out detailed feasibility work on the potential commercial value of these sites<sup>7</sup>, giving the impression that it would be this Government agency that would carry out development itself. We assume that at this stage back in 2022 the inter-agency negotiations on the OPDC Outline Business case had yet to establish a lead delivery role for the Mayoral Development Corporation.

## Neighbourhood plan proposals for development sites at Atlas Junction

7.11 Given the restricted boundary of the neighbourhood area fixed by OPDC in 2017 (and marginally revised in 2021) the Draft Plan is able to make specific proposals in relation to one site only. The Phase 1 proposals in the OPDC 2026 Position Statement include proposals for further high density development at Plot G01 and G02 Oakland North. This site lies just outside the neighbourhood boundary. *The document states 280 new homes at heights up to 28 storeys will benefit from the existing placemaking and critical mass of residents already established in the area.* Residents at Old Oaklands Rise, who have taken up occupation of car-free flats with erratic bus services temporary bus stops, and facing a further decade of disruption from HS2 works (including a 4 year closure of Old Oak Common Lane) will wonder what this sentence meant to mean.



*View of Atlas Road Junction sub-area, showing Shaftesbury Gardens, the Collective building and Oaklands Rise (bottom right) with the Atlas Road HS2 compound in the background.*

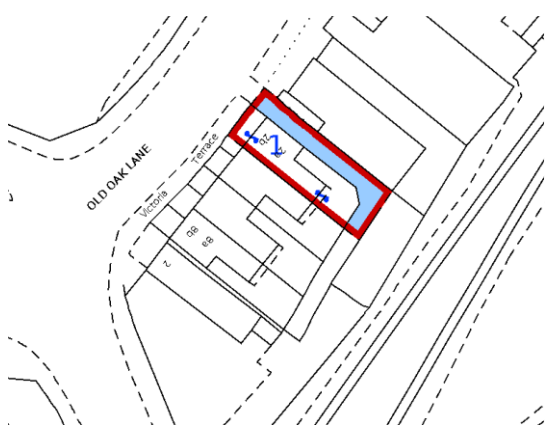
## Victoria Terrace

7.12 This is the one development site within the Old Oak neighbourhood boundary at the Atlas Junction sub-area. The site forms part of what the OPDC Position Statement relabels as **Plot F01 Victoria Terraces Cluster**, referred to above. This corner site on Old Oak Lane/Old Oak Common Lane was the subject of development interest back in 2019, when detailed proposals for a 15 storey building were consulted on, and resisted by residents as being out of scale with Victoria Terrace's existing two storey cottages.

<sup>7</sup> OONF obtained a copy of slides prepared by the HS2 Commercial Division

7.13 This earlier proposal (see overleaf) reached the stages of assessment by the OPDC Community Review Group but was not subsequently progressed by the developers. The consultation material had stated *The site will also be a short walk from Old Oak Common Station which is anticipated to open in 2026.*

7.14 The existing Old Oak Café on Old Oak Lane (which remains in operation) forms part of the development site. An OPDC report of December 2024, granting retrospective permission report to a rear extension of this property, notes that OPDC was by that time the owner of the freehold. The circumstances of this site acquisition are not known. More recently, OPDC show the property at 2A Old Oak Lane as having been acquired, as a separate small site (and presumably now included in the Victoria Terraces Cluster).

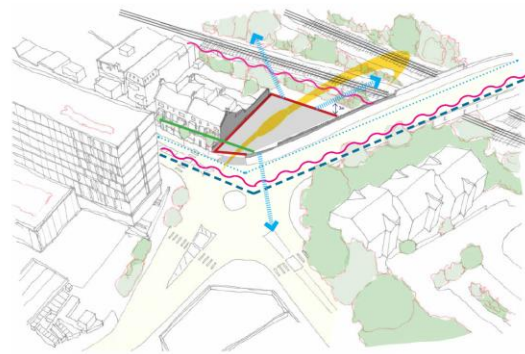


*Site of 2A Old Oak Lane, shown by OPDC as an acquired site (not confirmed by Land Registry records which may not be up to date).*



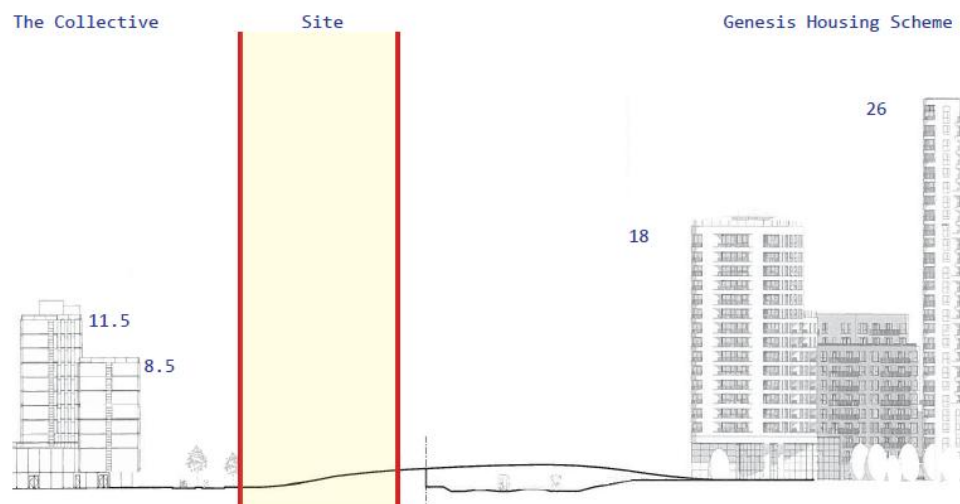
*2019 development proposal for Victoria Terrace*

Victoria Terrace, Old Oak Lane CGI of scheme



Victoria Terrace development site as consulted on in 2019

7.15 The Old Oak Neighbourhood Forum's earlier draft plans (2018 and 2021) recognised that this development site is suitable for a development of some scale. The site lies between the Collective building at 8-11 storeys and Oaklands Rise at 18-26 storeys.



7.16 Tall buildings within the OPDC area are defined as those above 15 storeys or 48 metres above ground (Local Plan Policy D4). This site falls within one of the several (imprecisely delineated) areas defined as appropriate for Tall Buildings on the map at 3.15 of the 2022 Local Plan.

7.17 Local Plan Policy P8C1: Atlas Junction Cluster includes the text below

*g) contributing to a variety of building heights including:*

*i) on the eastern side of Old Oak Lane, building heights should be taller close to the canal, comparable to the existing height of The Collective, and should decrease in height to respond appropriately to the existing Victoria Terrace;*

*ii) on Oaklands North, generally 6 to 8 storeys facing on to the Grand Union Canal, with generally 10 storeys along Union Way; and iii) on the western corner of Atlas Junction, heights of generally 8 to 10 storeys.*

7.18 In terms of appropriate housing density for the site, its 2023 PTAL score is currently 4 (rather than 3 as applies to development sites to the north and south within the neighbourhood boundary).

7.19 Taking this context into account this neighbourhood plan proposes Draft Policy OONA 3A below. This neighbourhood plan also proposes some 'Actions' for this important sub area. These are consistent with the Masterplan Framework proposals.

### **Masterplan Framework Proposals**

7.20 While supporting the concept of a neighbourhood centre at Atlas Junction, we are only now beginning to understand the intended scope of these two paragraphs below at page 150 of the Framework document.

- *lining available frontages of the Old Oak Mile, entrances to Channel Gate Park and routes to and along the Grand Union Canal with a variety of commercial units to complement social infrastructure anchors.*

- *maximising a high street parade and high-quality public realm from Atlas Junction to the Old Oak Lane bridge over the canal as the only section of the Mile in the Neighbourhood Centre where activation on both sides of the street is achievable.*

7.21 Since the introduction of the concept of the Old Oak Mile, in the OPDC Spatial Principles exercise, local residents have been sceptical about the idea of a 'mile long high street'. It is not clear how this could ever sustain the footfall to attract 'high street' uses. As recognised in the Masterplan, there are sections of this Mile where commercial or retail activation is unachievable.

7.22 The images at page 140 of the Framework document show very large buildings at the 'entrance to Channel Gate' and on the eastern side of Old Oak Lane between Atlas Junction and the canal. The 2022 Local Plan at 4.147 states *The Willesden Junction Maintenance Depot, the adjacent Power House and the sites on the east and west of Atlas Junction represent an opportunity to coordinate and optimise development to help establish this part of the major town centre.* As noted in respect of OONA sub-area 2 above, the 2026 OPDC Position Statement has revealed new plans for a 'two-sided high street parade' as part of the Phase 1 brief for a private sector partner. As yet there

is no published site plan for the Victoria Terraces Cluster.



Key corner signalling the entrance to Channel Gate Park from the Mile



An essential two-sided high street parade between Atlas Junction and the canal

7.23 We do not see policy justification in the 2022 Local Plan for the demolition of any existing houses along this stretch of Old Oak Lane, or anything that supports a requirement for extended ‘activation’ of the full stretch of the eastern side of the street from Atlas Junction to the canal.



7.24 Draft policies for this sub-area of the designated neighbourhood are set out below:

**Policy OONA 3A – To allocate the site within the designated neighbourhood boundary at Victoria Terrace for a mixed use development, primarily housing along with E1 commercial uses at ground floor (and scope for social/health/community uses above). With a maximum net residential density of 350 units/hectare and a maximum height of 30m including any podium deck.**

**Reasoned justification: a 30m height limit is at the level requiring referral to the Mayor of London, below which there are increased prospects of developer interest. This height allows for a building with 10 residential floors above 3m high ground**

*floor E1. This is similar to the higher part of the Collective building and is viewed by the neighbourhood forum as a maximum for a building that will affect views from Shaftesbury Gardens and the residential sections of Old Oak Lane.*

***Policy OONA 3B –To resist proposals for mixed use buildings above 6 storeys with activated ground floors on both sides of the stretch of Old Oak Lane between Atlas Junction and the Grand Union Canal, until such time as there is evidence of a sustained increase in demand and footfall for a two-sided ‘high street’ at this location..***

*Reasoned Justification: The concept of a ‘high street’ with 18 storey buildings and activated frontages on both sides of Old Oak Lane between Atlas Junction and the Grand Union Canal does not feature in the OPDC 2022 Local Plan or any other development plan document and is seen as harming the integrity of the Old Oak Conservation Area, as well as being unrealistic in terms of potential footfall. There is no evidence as yet on which to base assumptions of the impact of Old Oak Common station as a terminus, or as a rail interchange following the extension of HS2 to Euston*

#### ***Actions***

***Action 3.1 - To work with the Canal and River Trust and OPDC to achieve a long-term solution to providing access to the canal towpath. Two attempts at an Early Activation project in the form of a ramp at the bridge over the canal have not achieved a design that has prevented vandalism and graffiti.***

## CHAPTER 8 OONA SUB- AREA 4 – MIDLAND TERRACE AND SHAFTESBURY GARDENS

8.1 These two small and adjacent residential enclaves lie to the east of Victoria Road, a short distance south of the Atlas Road Junction. As for other sub-areas, OPDC drew a tight line around existing housing when setting the designated neighbourhood boundary in 2017. Hence there is only one development site included within this sub-area of the neighbourhood.

8.2 Since 2015 long established residents in the area have experienced huge uncertainties about OPDC plans. The Regulation 18 Draft Local Plan assumed a new Overground Station at Old Oak Common Lane, for which Midland Terrace would have been a major access and egress point. This and a second new station at Hythe Road were intended as the connection points with OOC station. The Hythe Road proposal was abandoned along with the Cargiant Masterplan in 2018. The Old Oak Common Lane station remains an (unfunded) aspiration as part of [TfL proposals for the West London Orbital line](#).

8.3 Both Midland Terrace and Shaftesbury Gardens have been severely impacted by HS2 construction compounds, including the overhead convener shown on the map below (now dismantled and removed).



*Midland Terrace/Shaftesbury Gardens sub-area with Old Oak neighbourhood area boundary shown as a blue line*

8.4 Midland Terrace consists of 35 Edwardian terraced houses, some converted into flats and others remaining as family homes. Shaftesbury Gardens is a relative recent (1990s) development of 170 flats (housing association and owner occupied) with communal outdoor space.

8.5 The original TfL consultation proposals for an Old Oak Common Lane Overground station situated the platforms around 350 metres to the west of the HS2/Queen Elizabeth line station, at a point on the track of the North London Line between Old Oak Common Lane and Midland Terrace. The proposed location of this station is constrained by other railway lines, roads and residential properties. The station design consulted on included an ‘overpass’ or bridge from Old Oak Common Lane to Midland Terrace and possibly extending to Victoria Road. Forecast costs at the time were £155m (outturn prices assuming delivery in 2026 excluding land costs) to Midland Terrace only and £173m (outturn prices assuming delivery in 2026 excluding land costs) to Victoria Road.



Figure (15) location of previously proposed Overground station at Old Oak Common Lane



Midland Terrace looking west

8.6 Clearly the character of Midland Terrace (currently a quiet cul-de-sac) would change greatly if this ever became an access and egress route to a new Overground station. Shaftesbury Gardens would also be affected.

8.7 An early CGI image of the completed station with a 'short' bridge is shown below.

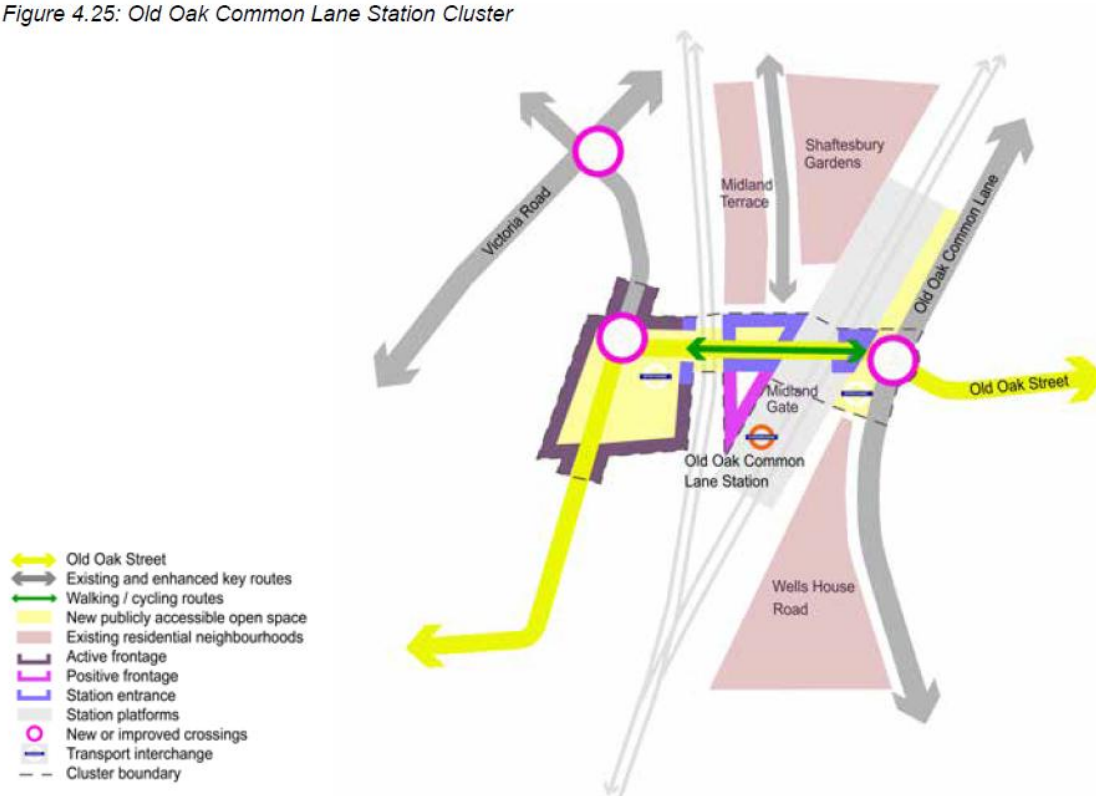


TfL 2017 CGI image of proposed Old Oak Common Lane station with access/egress on Midland Terrace

## 2022 Local Plan context

8.8 In the adopted 2022 Local Plan, this sub-area of the neighbourhood plan falls within the Old Oak Common Lane Cluster, as below:

Figure 4.25: Old Oak Common Lane Station Cluster



## Midland Gate

8.9 This is the one significant development site in the sub-area. It is now in the ownership of OPDC. This site has a single gated access onto Midland Terrace and was previously occupied by a two-storey factory building destroyed by fire in September 2013.

8.10 In March 2018 the site was granted by OPDC an 18 month planning use (B8) as an open car storage facility for Linwest Ltd (also known as Acton Coachworks). A 2019 application to extend this use for 5 years was delegated by OPDC to LB Ealing, and is shown on the LBE website as having been withdrawn.

8.11 Policy P7C2 ‘Old Oak Common Lane Station Cluster’ of the OPDC Regulation 19 Draft Local Plan, promoted the site for mixed-use development. The site is not identified as a specific site allocation in Table 3.1 of the adopted Local Plan (or in the map of site allocations at Figure 3.17. Nor does it fall within the large an undelineated area seemed appropriate for Tall Building in Figure 3.15.

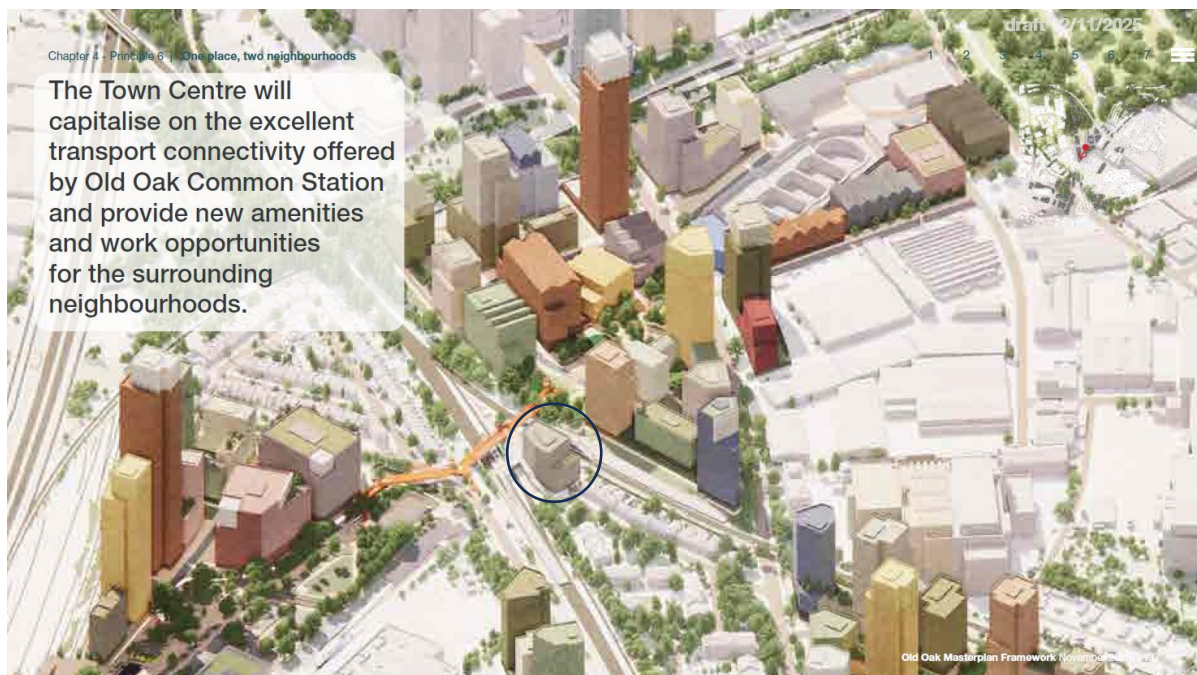
8.12 In the Old Oak West SPD, the site is not specifically mentioned in the Place and Cluster section on North Acton and Acton Wells Place (see overleaf). It features in the table in section 12 on Delivery and Implementation (page 114) as below:

Site name	Site allocation number	Development Capacity Study Site number	Net additional housing units during the first ten years of the plan period	Net additional housing units during the 11 to 20 years of the plan period	Minimum commercial or industrial floorspace in square metres over the plan period. Floorspace is provided as Net Internal Areas (NIA).	New jobs resulting from the provision of commercial or industrial floorspace over plan period (indicative)
Midland Gate	Not a site allocation	30	50	0	0	0

8.13 This neighbourhood plan supports the principle of mixed use on the site and includes a specific policy OONA 4A for the site. Where this Draft Plan varies from the SPD is that we do not accept that the site has the capacity to deliver 50 housing units in the period 2018-28.

## Masterplan Framework

8.14 In this document the Midland Gate site features at No.9 on a map of ‘Development Zones’ on page 153. A graphic image of the newly defined ‘Old Oak Town Centre’ shows what appears to be a mid-rise building covering the site (see below). This would be a significant departure from the 2022 Local Plan and is resisted in this neighbourhood plan (see Draft Policy OONA 4A).



### **Impact of the 2025 OPDC CPO Order**

8.15 The OPDC CPO Order, which was ‘made’ by the Development Corporation in September 2025 and remains subject to decision by the Secretary of State, includes a small piece of land owned by the Shaftesbury Gardens Management Company. This caused significant concern amongst leaseholders of these homes, alleviated to an extent when it became clear that OPDC were seeking short-term use of the land as a potential logistics site for development at Midland Gate. An inquiry on the CPO Order is expected in autumn 2026.

### **Cerebos Gardens and Midland Terrace Play Area**

8.16 A small play area at Midland Terrace has for many years provided a local amenity, coupled with strip of open space between Victoria Road and the buildings of Shaftesbury Gardens. These pieces of land along with Victoria Garden (on the other side of Victoria Road) were selected by OPDC as one their ‘early activation’ projects, working with local residents.

8.17 This project proved to be a genuine exercise in ‘co-design’ between the Corporation and the local community. Hayatsu Architects were appointed at the start of 2020 by a selection panel, which included community representatives.

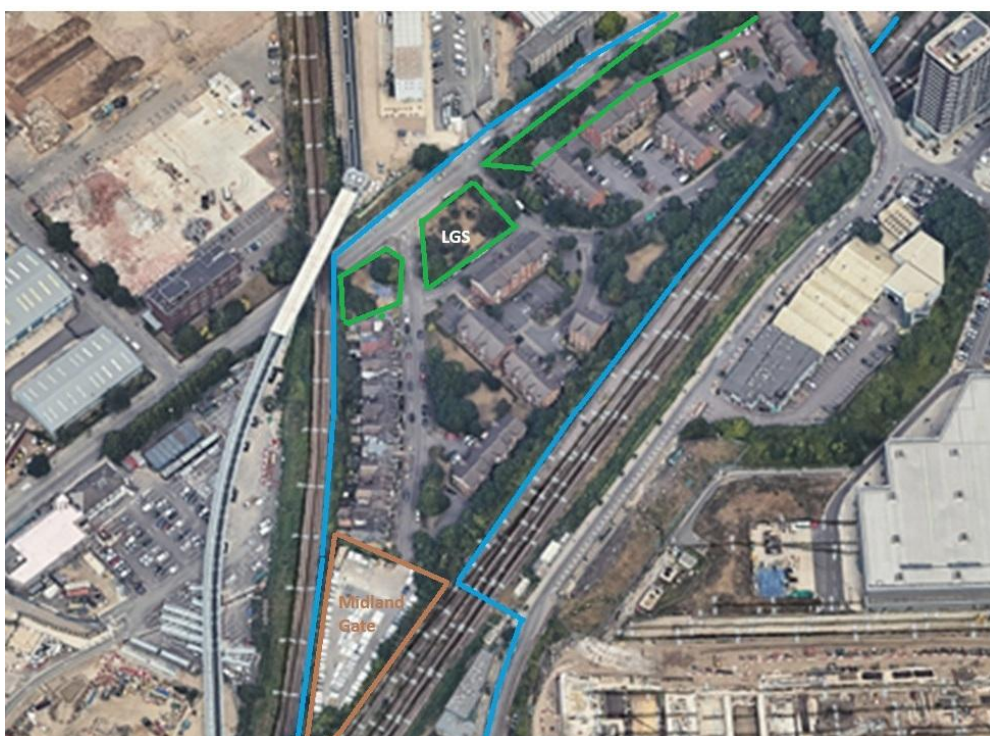
8.18 The playspace project was subsequently implemented but the scheme for Cerebos Gardens was not (design costs having absorbed a large part of the available budget).

8.19 This neighbourhood plan proposes that Cerebos Gardens and the Play Area be designated as Local Green Space, via Policy OONA 4B below.



CGI images of improvements at Cerebos Gardens

8.20 Neighbourhood Plan policies and actions for this sub-area are set out below:



**Policy OONA 4A – to allocate the site at Midland Gate (shown with a brown boundary above) for a mixed use development, primarily housing along with E1 commercial uses at ground floor (and scope for social/health/community uses above). With a maximum net residential density of 250 units/hectare and a maximum height of 8 storeys or 23m including any podium deck.**

**Reasoned justification: this site is not identified in the 2022 Local Plan as being suitable for Tall Buildings. Tall buildings within the OPDC area are defined as those above 15 storeys or 48 metres above ground level. Anything higher would be contrary to London Plan Policy D9. A taller building would impact severely on existing housing at Midland Terrace and Shaftesbury Gardens. This height allows**

**for a building of 7 residential floors above E1 space at ground floor. The site has a PTAL level of 3 with limited vehicle access (from Midland Terrace only) and is not appropriate for higher density development.**



Midland Gate site

**OONA Policy 4B - to designate as Local Green Space the childrens play area and the two parts of Cerebos Gardens adjacent to Victoria Road (as shown with green boundaries in the map above).**

**Reasoned justification: This designation would give protection to well used green spaces for which improvements have been prepared by OPDC and implemented in the case of the childrens playground.**

**OONA Action 4A – to support the Shaftesbury Gardens Management in achieving an agreed outcome on the OPDC September 2025 CPO Order.**

## Chapter 9 OONA SUB-AREA 5 WELLS HOUSE ROAD

9.1 Wells House Road is a triangular area with its one continuous street serving 120 Edwardian semi-detached houses built on either side of the road. As a residential enclave the area has always had vehicle access only to and from Old Oak Common Lane. Midland Terrace and Victoria Road lie close by as the crow flies (but separated by rail tracks).

9.2. The boundary of the neighbourhood area was drawn by OPDC very tightly around the existing housing at Wells House Road. This left little scope for a neighbourhood plan to bring about any change. Wells House Road is midway between North Acton and Willesden Junction station and these houses have PTAL level between 1b and 3 (unusually low for locations in the inner/outer London border).



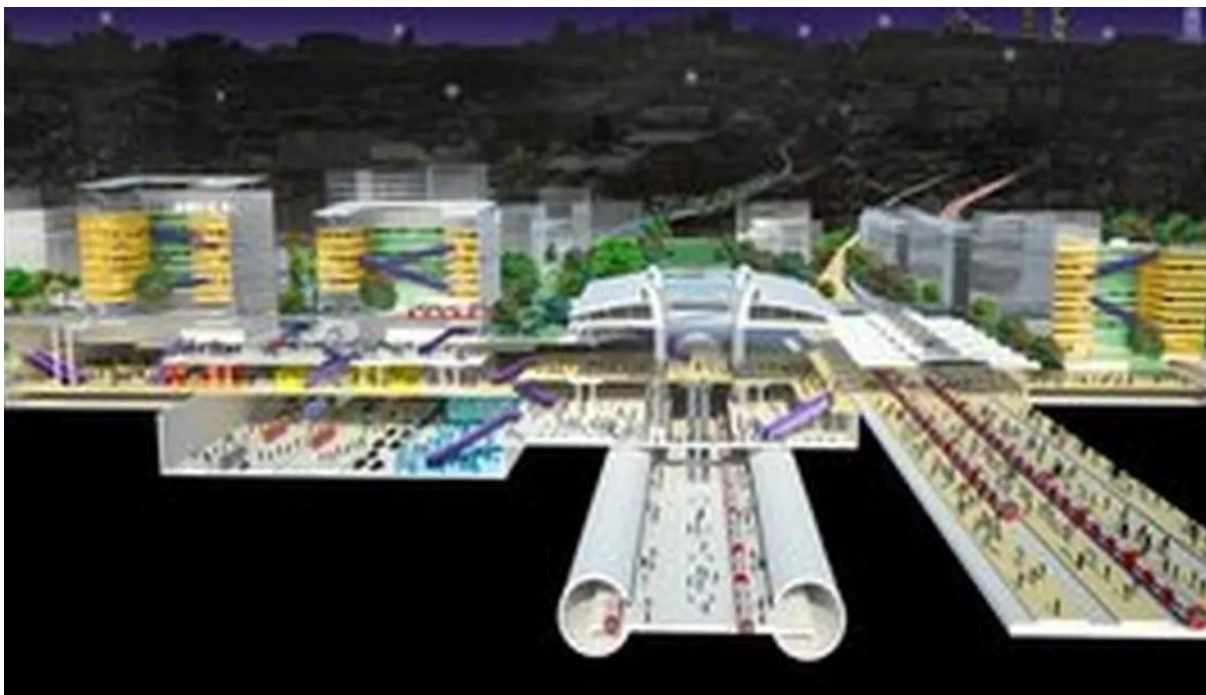
*Map of OONA sub-area 5 Wells House Road showing neighbourhood boundary in blue*

9.3 This sub-area within the 2021 neighbourhood area boundary has its sole entrance/exit on Old Oak Common Lane, close to the existing entrance/exit across the road for the OOC station site. For over a decade, the residents association at Wells House Road has been at forefront of those dealing with impacts of construction works as well as the long-term impacts of a £1.7bn rail interchange with a single vehicle access on a road never designed to deal with high volumes of traffic. Temporary traffic lights have been a frequent feature. The continuing threat of a four year complete closure of this road from 2028 (for HS2 bridgeworks to take place) is one of multiple problems with which Wells House Road residents have had to contend.

9.4 Next to the OOC station sites former railway land badged by HS2 as 'the Adjacent Site' and currently cleared. This site was allocated for high density commercial

floorspace in the 2016 Regulation 18 Local Plan and this proposed use has not changed.

9.5 Prior to the Mayoral OAPF, architect Terry Farrell was commissioned by LB Hammersmith & Fulham to work up ideas for OOC station. These plans (published in 2011) included creating a podium deck and 'overbuilding' parts of the station. The proposals were well received at the time, but subsequently dropped in 2015 on grounds of cost, construction issues and differing timetables. This scenario was viewed by Farrell as a major lost opportunity to create a potential 12,000 homes and a major commercial/retail centre.<sup>8</sup>



*Image of Terry Farrell design for 'Park Royal City'*

### **The 'Adjacent Site'**

9.6 Immediately next to the site where the Old Oak Common Station is being built is a triangular area of land known as the 'Adjacent Site'. This land is one of the four main construction compounds owned by DfT. In 2019 this piece of land was marketed by the Commercial arm of HS2 (see below). A more detailed set of HS2 proposals for this site also surfaced in 2022.

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<sup>8</sup> [Farrell: Old Oak Common 'worst cock-up in years'](#)

## Design supports future development

### Key Design Features:

- Designed to Pedestrian Modelling Scenario 2B (2041 +35% growth) and stress tested against full OPDC build out, Crossrail upgrade and TfL Overground Stations (scenario 8)
- OOC lane junction designed to accommodate future TfL Overground Station
- ASD boundary line optimised to maximise ASD potential (Achieving >200,000m<sup>2</sup> of development potential)
- Coordinated design with potential future Hybrid Bridge and elevated pedestrian link (now Old Oak Bridge).



Table 1 - Pedestrian Demand Forecast Scenario Assumptions

Passenger Demand Scenario	HS2 trains per hour	OPDC stations per hour	Overground stations included	Crossrail trains per hour	OPDC Development 2038 Buildout
Scenario 1A	18	19	No	24	No
Scenario 2B	18	24	No	24	No
Scenario 3	18	24	Yes	24	No
Scenario 4	18	24	Yes	30	No
Scenario 5	18	19	No	24	Yes
Scenario 6	18	24	No	24	Yes
Scenario 7	18	24	Yes	24	Yes
Scenario 8	18	24	Yes	30	Yes

2019 HS2 marketing material of the Adjacent Site

9.7 To the confusion of the public, HS2 for many years consistently showed images of this site in its public consultation material. The image (below) was of a new rail interchange in a green field, rather than a site for high density commercial office and retail development.



HS2 CGI image of Old Oak Common station, showing the 'Adjacent Site' with no future development

9.8 The fact that this contradictory information continued to be published for several years was raised with the OPDC Board Chair in early 2019. Commitments were given of improved liaison between OPDC and HS2. Yet the same HS2 2019 consultation leaflet remained on the HS2 Commonplace website for Old Oak Common until 2021.

This history is rehearsed in this neighbourhood plan for two reasons:

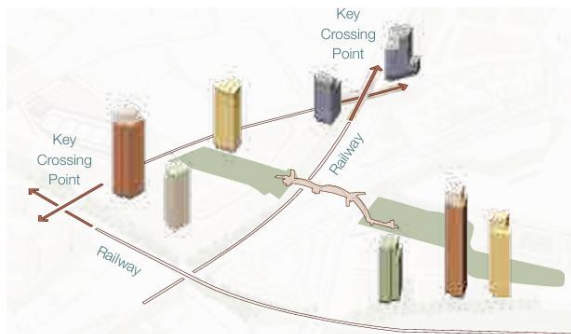
- A reminder of the length of time during which residents of Wells House Road have faced uncertainties and drastic changes of plan for their surroundings dating back over a decade (including Cargiant's 2015-18 proposals for Old Oak Park and a 'major town centre at Hythe Road').

**To reinforce the case for well planned ‘meanwhile regeneration’ around OOC station for the period 2026-40. The OPDC Masterplan Framework 2025**

9.9 OPDC’s ‘Framework’ document setting out its 2025 Old Oak Masterplan incorporates a new and varied set of proposals for the area around Wells House Road. This follows four iterations of the Local Plan and a fifth version included in the 2024 Old Oak West SPD. This latest masterplan involves significant changes from the adopted 2022 Local Plan.



The 2025 Masterplan shows Wells House Road lying between two parts of what is described as a *new urban centre for West London, at the heart of WestTech London, with unrivalled connectivity*. New emphasis is placed on the east west bridge connecting Acton Wells to OOC station and on attracting ‘anchor uses’



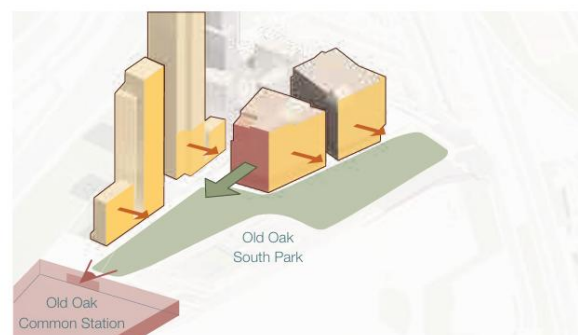
Tall buildings located along the railways and key crossing points



Lower heights adjacent to Wells House Triangle and Midland Terrace



Southerly building heights reduced to maintain sunny parks



Buildings defining the single-sided Old Oak South Park and providing a prominent facade

9.10 The potential impacts of this approach are shown in the above images (page 135 of the Masterplan Framework). It is hard to think of other ‘major town centres’ in London

which have been planned, and have sustained successfully, on either side of a triangle of 120 semi-detached Edwardian houses and with a bridge connection to the main public transport node.

9.11 Assumptions that it will prove possible to attract ‘anchor uses’ to this destination are questioned by local people. As noted in the section on transport and connectivity in this draft neighbourhood plan, this location has low-to-medium levels of access to public transport (PTAL levels) and these may not improve before 2040.

9.12 The ‘anchor uses’ envisaged in the Masterplan include *academic institutions, innovation hubs, cultural and entertainment centres, FE and technical colleges, and an integrated leisure centre*. North Acton has a major development site at One Portal Way destined for some academic uses amongst the recent additions of student housing blocks, where a meanwhile use is now proposed.

9.13 Local people are sceptical that these ‘anchor uses’ will be attracted to the Acton Wells location in the next 15 years – unless the West London Orbital project is implemented.

9.14 This part of London will be competing with Hammersmith with its established ‘innovation zone’ and the major theatre/music venue/cinemas opening shortly at Olympia. OPDC previously used consultants to explore levels of interest from London museums in locating an offshoot at Old Oak, following the example of V&A East, with no apparent success. North Acton, despite its new ‘cluster’ of buildings, is the opposite of a ‘destination’. Student blogs make clear the lack of anything to do locally in the evenings and the need to travel into central London.

9.15 Given the lack of any development sites at Wells House Road, there is little that a neighbourhood plan can argue for in this chapter, other than to try to point OODC in the direction of a ‘meanwhile regeneration’ approach until levels of investment interest at Acton Wells become more clear.

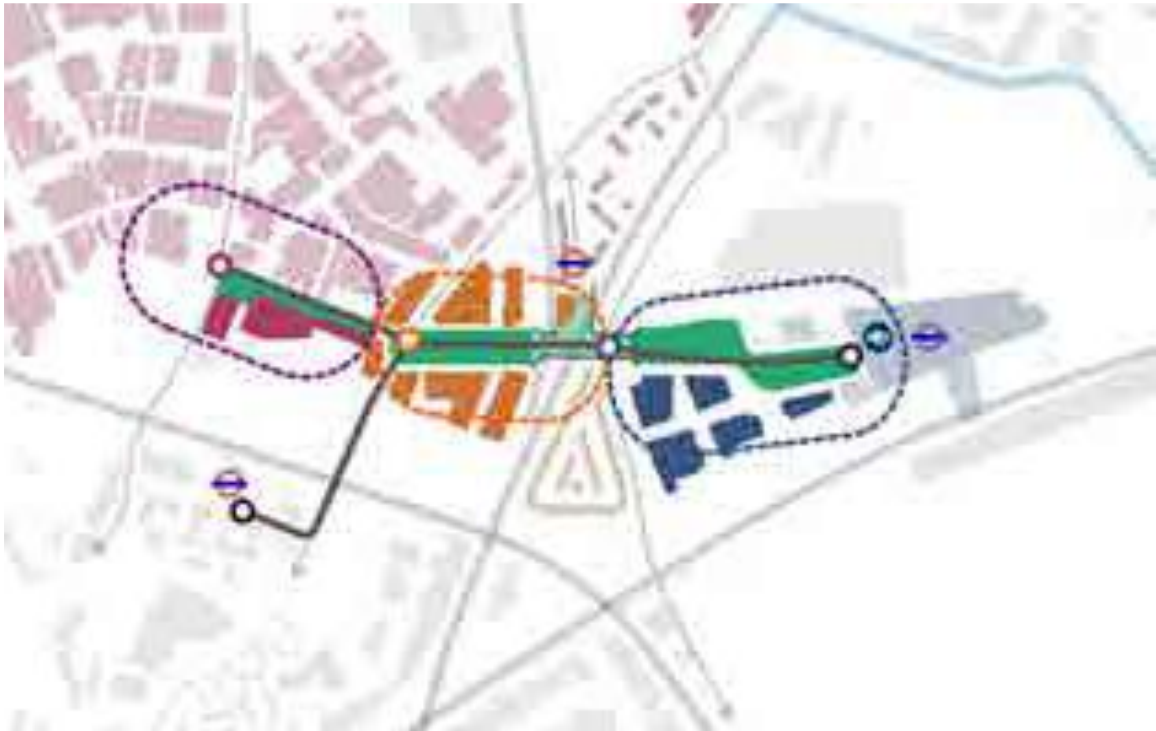
### **Creating the ‘Old Oak Line’**

9.16 The 2022 Local Plan assumes an east/west ped/cycle bridge that will connect OOC station with what is defined as the North Acton and Acton Wells Place. This has an accompanying set of Place Policies P7.

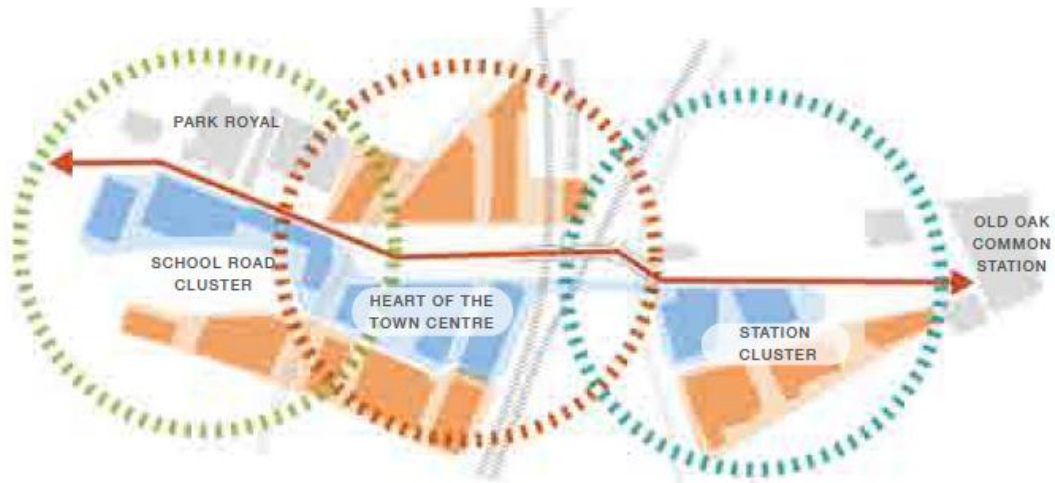
9.17 In the 2025 Masterplan Framework, increased emphasis is placed on the potential connectivity that such as bridge would bring. It is rebadged (again) from being called ‘Old Oak Street’ to a new name the ‘Old Oak Line’. This piece of infrastructure is promoted as connecting three mixed use clusters of different characters, related to their different contexts as shown in diagrammatic form below.

9.18 Local residents impacted on by this new bridge have yet to obtain any clarity as when OPDC intends to commission the construction of this bridge. It is illustrated as having a series of entry and exit points (see below). Its relationship with Midland Terrace is not shown in any detail. OPDC has acquired a property at Kildun Court in Old

Oak Common Lane, and has rehoused its occupants, on the basis that this site is required for bridge foundations.



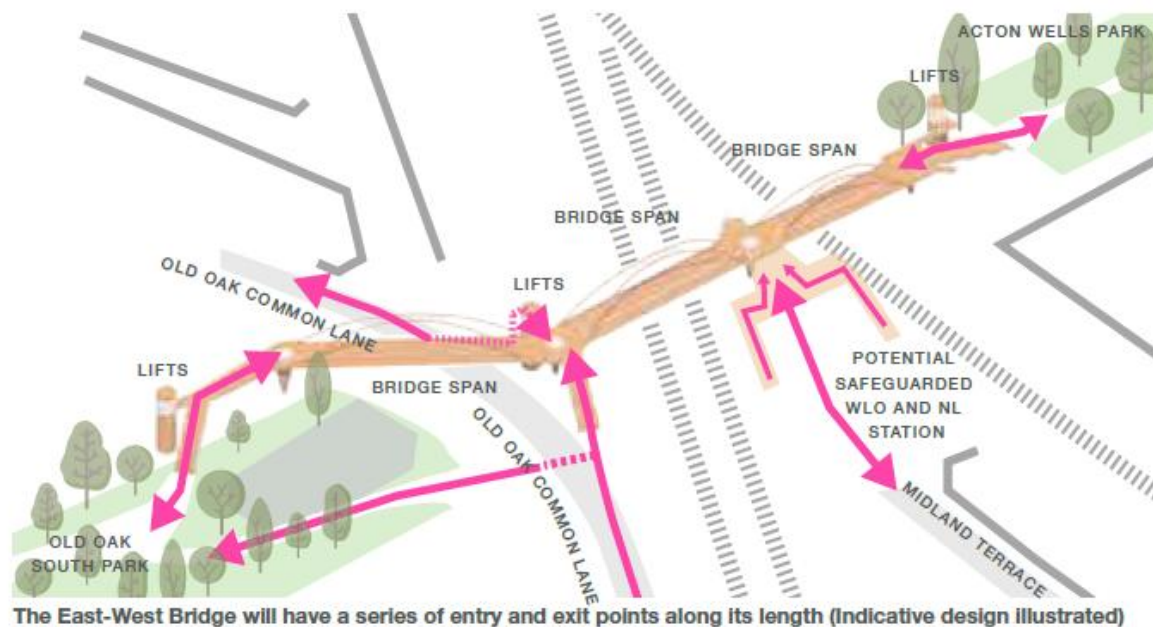
*Diagram of the 'Old Oak Line' from OPDC Masterplan Framework*



*The 'three clusters' propose to be connected by the Old Oak Line*

9.19 Our Forum questions the merits of constructing this bridge unless and until there is certainty of the opening date for OOC station and the two projects can be phased in

parallel. Until some explanation is provided on the timing of proposal bridge construction, and the funding source becomes clear, this neighbourhood plan proposes a 'safeguarding' policy and site allocation OONA 5A



*Diagram of the bridge creating the 'Old Oak Line'. Again this image is shown as looking from the north to the south, rather than the normal mapping convention, with the OOC station site on the left.*

## Neighbourhood Plan 'Actions' which could bring benefits to Wells House Road

9.20 Some of the 'neighbourhood-wide' policies in this Draft Plan will be of benefit to residents in Wells House Road (e.g. on HMOs) along with this Plan's efforts to moderate OPDC's Masterplan proposals for housing densities and Tall Buildings. There are also some 'Actions' set out below which are not planning policies, but which are strongly supported by local residents.

9.21 In 2025 residents in Wells House Road set up the Old Oak Alliance. This is a WhatsApp network focused mainly on interaction with HS2 and its construction consortia working at Old Oak Common station. The Alliance has been active trying to ensure greater involvement of Ealing MP Rupa Huq and ward councillors in mitigating HS2 construction impacts.

9.21 Ealing Council is seen locally as having been far less effective than Camden Council, in securing Assurances and Undertakings within the 2017 HS2 Act. Less local authority support has been provided than in Camden, in helping to resolve problems and complaints with HS2. The Alliance has been trying to achieve an updated set of Assurances, as part of the HS2 reset.

## Neighbourhood Plan policies and 'actions' for OONA sub-area 5 Wells House Road

**OONA Policy 5A – to safeguard the sites needed to construct the east west bridge in accordance with Local Plan Policy P7(m) for Place North Acton and Acton Wells**

*Reasoned justification: until it becomes evident over what timeline Old Oak Common station will be completed and in operation, commissioning and phasing the construction of this high cost piece of infrastructure would be premature.*

*Action OONA 5A To support the Wells House Residents Association and the Old Oak Alliance in questioning the necessity to lower the bridges on Old Oak Common Lane in order to allow the use of double decker buses as surface transport to and from Old Oak Common Station.*

*To support local residents in seeking updated Undertakings and Assurances from HS2 in respect of the potential extended closure of Old Oak Common Lane and reconstruction of the retaining wall on the west side of Wells House Road are fully met, along with remediation measures for the impact of HS2 works. This location has been recognised by HS2 as having the greatest harmful impacts of anywhere along the HS2 line..*

## ANNEXE A INITIAL BASIC CONDITIONS STATEMENT FOR THIS DRAFT NEIGHBOURHOOD PLAN

A.1 For a neighbourhood plan to be ‘made’ (adopted) as part of the development plan for an area, it must meet certain statutory requirements including a set of ‘Basic Conditions’. These conditions were first included in the 2011 Localism Act and are incorporated in subsequent pieces of planning legislation.

A.2 At the stage of submission of a draft neighbourhood plan, the local planning authority (OPDC) carries out a check of **legal submission requirements** under *Schedule 4B, para 6(2)* of the Town and Country Planning Act 1990. This is **not** an assessment of whether the Basic Conditions are *met*—only whether the submission is *valid* and can be sent for examination.

A.3 The Forum considers that these submission requirements will be met, for these reasons:

- The draft plan has been prepared and submitted for examination by a qualifying body - the Old Oak Neighbourhood Forum. The Forum was first designated by OPDC in 2018 and re-designated, following a second public consultation, by OPDC Board on 9 March 2023. It is the correct body to be submitting a draft neighbourhood plan.
- A map identifying the designated neighbourhood area will be included in the Submission version. The boundary used is that designated by OPDC Board on 30 November 2021 with small variations to that originally designated in 2017.
- The submitted draft plan will specify the period covered (2026-2040) and will include a map identifying the neighbourhood area.

### **Compliance with the Basic Condition as in force post March 2026**

A.4. The Forum considers that this draft neighbourhood plan meets the Basic Conditions as they apply **after 25 March 2026**, following the commencement of sections 98–99 of the Levelling-up and Regeneration Act 2023 (LURA 2023) and the associated modifications to Schedule 4B of the Town and Country Planning Act 1990 (“TCPA 1990”) made through section 38C(5) of the Planning and Compulsory Purchase Act 2004 (“PCPA 2004”).

A.5 The commencement of these provisions by SI 2026/169 means that the Basic Conditions applicable to neighbourhood development plans now differ materially from the pre-2026 framework.

### **Removal of the General Conformity Test**

A.6 Prior to 25 March 2026, neighbourhood plans were required to meet the Basic Condition in paragraph 8(2)(e) of Schedule 4B TCPA 1990: *“the making of the order is in general conformity with the strategic policies contained in the development plan...”*

A.7 However, for neighbourhood development plans, **this provision no longer applies.**

A.8 Under section 38C(5)(d) PCPA 2004, Schedule 4B is applied with modifications. Following the amendments introduced by section 99 LURA 2023, these modifications now:

- omit paragraph 8(2)(e) (the general conformity test), and
- substitute a new paragraph 8(2)(ea), which introduces a new Basic Condition relating to housing provision.

A.9 Accordingly, a neighbourhood plan is no longer required to demonstrate general conformity with the strategic policies of the development plan.

A.10 Compliance with Basic Conditions in this post March 2026 scenario is set out below.

**Basic Condition 1: The plan must have regard to national policy and advice issued by the Secretary of State. The Forum considers this to be the case in terms of compliance with the 2025 NPPF and the consultation version of a new NPPF. The criteria for designation of Local Green Spaces has not changed from those introduced in earlier versions of the NPPF.**

**Basic Condition 2: The plan must contribute to the achievement of sustainable development.** The Forum considers that the Submission Version will meet this requirement. More evidence will be included in the final Basic Conditions Statement. This is a question for the independent Examiner to test.

**Basic Condition 3. The new condition on a Housing Requirement.** The substituted Basic Condition at paragraph 8(2)(ea) now requires that:

***“the making of the neighbourhood development plan would not result in the development plan for the area of the authority proposing that less housing is provided... than if the neighbourhood development plan were not to be made.”***

This new condition is a quantitative, outcome-based test. It is likely to be a key issue at the stage of independent examination, as a result of conflicting views between OONF and OPDC on the legal questions involved.

As we understand this new position, this revised draft neighbourhood plan needs to demonstrate that:

- **it does not delete or reduce any strategic housing provision in the development plan.** The draft NP includes two sites allocated in the 2022 Local Plan as part of Site 26 Channel Gate. It also includes sites identified in a 2021 OPDC Development Capacity Study and in the 2025 Masterplan Framework. The Forum argues that housing numbers identified for these latter sites in the OPDC Indicative Housing Requirement **do not constitute ‘housing proposed’ for the purposes of the new Basic Condition introduced under sections 98 and 99 of LURA 2023.**

- **it does not introduce policies that would prevent the delivery of the housing proposed by the development plan.** As above, the legal argument at Examination stage will be whether housing sites and numbers in an 2021 evidence base document (the Development Capacity Study) which OPDC subsequently chose **not** to include in the Post Submission Modified Draft Local Plan (as subsequently modified by the Planning Inspector) should be treated as ‘Housing proposed’ for the purposes of the new Basic Condition.
- **The draft revised plan’s policies, taken as a whole, do not result in a lower level of housing provision than would otherwise occur.** The Forum will argue at Examination stage that a draft neighbourhood plans must be examined against the adopted 2022 OPDC Local Plan as in force. Our position is that an examiner may *only* take account of “emerging policy” in a new Local Plan **once that plan has reached a sufficiently advanced stage of preparation—** normally **post-Regulation 19 publication** and **especially once submitted for examination.**

**Basic Condition 4. EU Obligations / Environmental Assessment Condition:** The revised plan must be compatible with:

- Strategic Environmental Assessment (SEA) requirements
- Habitats Regulations Assessment (HRA) requirements (These obligations remain in force post-Brexit through domestic regulations.)

The Forum will seek a view from the OPDC as local planning authority on whether the draft neighbourhood plan will have any significant environmental effects and will require a Strategic Environmental Assessment (SEA) or raise issues in relation to Habitats regulations. This outcome is considered unlikely. The same applies in respect of compatibility with retained European obligations and Human Rights requirements.

#### **Additional legal compliance conditions**

A.12 The changes flowing from the Levelling Up and Regeneration Act 2023 have added two further legal requirements. These are not new Basic Conditions as such but will be considered by the Examiner at examination stage. The two new requirements are:

- So far as the qualifying body (the Forum) considers appropriate, and having regard to the subject matter of the plan, the plan must be designed to secure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to climate change, and
- So far as the qualifying body considers appropriate and having regard to the subject matter of the plan, the plan must be designed to take account of any local nature recovery strategy under section 104 of the Environment Act 2021 that relates to all or part of the neighbourhood plan area.

A.13 The Forum is aware of the GLA’s [Local Nature Recovery Strategy and OPDC’s 2024 Public Realm and Green Infrastructure Supplementary Planning Document](#). [Relevant considerations will be included in the Submission version of this draft neighbourhood plan.](#)

## The new National Planning Policy Framework

A.14 As noted above compliance with national guidance is a Basic Condition. The NPPF is the Government's policy framework for the nation's overall planning system. Consultation ended in March 2026 on a substantially revised version. This sets out in succinct form what a neighbourhood plan can and cannot do, as below:

*1. Neighbourhood plans allow local communities to plan positively for their areas by identifying and addressing community priorities that can be met or supported through the planning system. They should do this by:*

*a. Allocating land to meet the development needs of their designated area, where it is appropriate to do so; and*

*b. Setting out policies which address particular local issues, these should relate to site specific matters or, where appropriate, may cover wider issues such as the provision of infrastructure and community facilities, regeneration opportunities, design requirements (including design codes), local environmental improvements and the conservation of local heritage assets.*

*2. Neighbourhood plans should not promote less development than provided for in other parts of the development plan for the area.*

A.15 As explained above the Forum will seek to demonstrate at Exmaination stage that the draft neighbourhood plan does not promote '*less development than provided for in other parts of the development plan for the area*'. Other parts of the development plan are the London Plan and the OPDC Local Plan. The map and table at Policy SP10 in the 2022 Local Plan (pages 46-48) set out the quantum of development provided for in the Local Plan. The Draft NP does not reduce this quantum.

A.16 Ever since its 2018 version, the NPPF has also included a requirement on the local planning authority to set a Housing Requirement figure for any neighbourhood plan within its administrative area. OPDC has prepared a note on its Housing Requirement for the Old Oak neighbourhood area only recently in response to a first draft of this neighbourhood plan.

## The OPDC Housing Requirement Note

A.17 Following a meeting with OPDC planning officers on March 6<sup>th</sup> 2026, OPDC provided a note setting out a Housing Requirement figure along with background as to how it has been calculated. This note was subsequently revised by OPDC and the June 23<sup>rd</sup> version is included in full as part of this Annexe A to this draft neighbourhood plan.

A.18 The OPDC's stated requirement is for a minimum of **510 new homes** across the five development sites that lie within the Old Oak neighbourhood boundary. The Note breaks this down as below:

Table 2: OPDC Local Plan site allocations and development sites

Site	Site reference	Minimum homes capacity
Goodhall Street East	DCS site 54 (part of)	42
Ursula Lapp	DCS site 55	250
Lords Builders Merchants	Site allocation 26 (part of)	158
Old Oak Cafe (2 Victoria Terrace)	DCS site 16	10
Midland Gate	DCS site 30	50
<b>Total</b>		<b>510</b>

A.19 The Forum has corresponded extensively with OPDC on the validity of this Housing Requirement note. The difference of view between OPDC and OONF was also discussed at the OPDC Residents Panel on June 4<sup>th</sup> 2026.

A.20 Of the five sites listed, only Lords Builders Merchants and Old Oak Café (2 Victoria Terrace) appears in the schedule and map of site allocations in the 2022 adopted Local Plan (as part of site 26 Channel Gate).

A.21 The remaining three sites feature in a 2021 Development Capacity Study prepared as part of the evidence base for the Local Plan. This study assesses ‘deliverability’ of 63 possible sites in the OPDC area and gives site areas and potential housing numbers. As stated previously our advice is that **a Development Capacity Study does not form part of the development plan and therefore the housing numbers shown in this document do not constitute ‘housing proposed’ for the purposes of the new Basic Condition introduced under sections 98 and 99 of LURA 2023.** If all 63 DCS sites were to be treated as ‘housing proposed’ this could impact on the Basic Conditions applying to any further neighbourhood plan proposed in the OPDC area.

A.22 The three sites in question (Ursula Lapp, Goodhall Street East, and Midland Gate) along with ‘Old Oak Café/Victoria Terrace as a site separated out from ‘No.26 Channel Gate’ feature in Table 12.1 and the map a Figure 12.4 of the Old Oak West SPD. But without site allocation numbers and with notes in each case reading ‘*not a site allocation*’. As a Supplementary Planning Document giving ‘policy guidance’ and not creating ‘new policy’ this material **is not part of the development plan and hence not relevant to the new March 2026 Basic Condition.**

A.23 The OPDC 2025 Masterplan Framework document also includes these development sites with illustrations of what buildings might be built on them. In Chapter 5 of the Framework document, these sites are shown as being amongst 13 ‘Development Zones’. But as the Forum has repeatedly pointed out to OPDC since November 2025, this document has not been prepared as a development plan document (with the statutory public consultation and examination that is required by the Planning and Compulsory Purchase Act 2004). **Hence the Framework document is also not relevant to the March 2025 Basic Condition. Nor is a recent document titled OPDC Position Statements included in the tender pack for potential private sector master developer partners.**

A.24 In its revised June 23<sup>rd</sup> Indicative Housing Requirement, OPDC acknowledges that As the Forum sees the position, this outcome has arisen as a result of previous OPDC choices not to prepare its Old Oak West SPD and the latest Masterplan within the statutory framework that applies to development plans. The Forum has questioned why these choices were made, in our correspondence on the status of the Masterplan Framework, but without an explanation. Relevant correspondence is [here on our website](#).

A.25 OPDC has provided legal advice from a KC supporting its treatment of sites in its Indicative Housing Requirement. The Forum has responded. Further exchanges are continuing. At submission stage, the Forum's Basic Conditions Statement will include all relevant correspondence so that the public are able to take a view during the Regulation 15 consultation by OPDC. This material will also be available to the independent Examiner, who will be making the decisions on compliance with Basic Conditions

A.26 In our view the total Housing Requirement that can legitimately be set by OPDC is a figure of 168 new homes, reflecting Local Plan allocations for the Lords site and Old Oak cafe (as part of site 26 Channel Gate. The site allocations and policies in this Draft Plan will deliver a significantly higher figure, based on the density policies proposed for each of the sites shown on the map at page ( ). But this will be a figure short of 510.

A.27 The Forum will be arguing at Examination stage that the housing numbers proposed in the Submission Version of the Draft Plan are at appropriate net residential densities for the levels of access to public transport most likely to pertain for the plan period 2026-40. The section on Transport at pages ( ) to ( ) of this Draft Plan set out the reasoning for this view, taking account of the latest timeline for completion of the HS2 project and the prospects for an additional Overground station at Old Oak Common Lane as part of the West London Orbital project.

A.28 We will also be arguing, as set out in the Forum's letter of May 7<sup>th</sup> 2026, responding to the legal opinion from Richard Moules KC, that the housing proposals in the neighbourhood plan will more than achieve *the minimum of 18,900 homes on Site Allocations* which is set by OPDC Local Plan Policy HO1. The 19,850 housing target set by 2022 Local Plan, as modified by the Planning Inspector, is not at threat from the proposals in this Draft Neighbourhood Plan.

## ANNEX B OPDC's HOUSING REQUIREMENTT FOR THE NEIGHBOURHOOD PLAN

### Indicative Housing Requirement for the Old Oak Neighbourhood Area – 23 June 2026

#### Purpose of this Note

This note sets out an Indicative Housing Requirement (IHR) for the Old Oak Neighbourhood Area and how it has been identified. It modifies the original IHR note provided on 23 March 2026 by providing detail regarding how the methodology relates to the Planning Practice Guidance. This detail reflects content of the 21 April 2026 Counsel Opinion.

#### Indicative Housing Requirement

The IHR for the Old Oak Neighbourhood Area is a **minimum of 510 new homes**.

#### Methodology

Currently the Planning Practice Guidance (PPG) provides guidance from 2019 and the draft National Planning Policy Framework (NPPF) sets out updated guidance for providing and developing an IHR.

#### Provision of an IHR

The draft NPPF policy HO2(5) requires local planning authorities (LPA) to provide an indicative housing figure for neighbourhood areas if there is not one currently in a Local Plan. Previously the PPG required neighbourhood forums to request an IHR from their LPA.

#### Developing an IHR

The draft NPPF policy HO2(5) lists three factors that should be taken into account in developing the IHR. These are set out in table 1 with a description of how they have been considered for developing the IHR for the Old Oak Neighbourhood Area:

*Table 1: Factors and overview of their consideration*

Factor	Source	Consideration of use
Latest evidence of local housing need	<a href="#">OPDC Strategic Housing Market Assessment (SHMA)</a> 2018	The SHMA identified the housing market area for the OPDC area to comprise the three host boroughs. This identified a total housing need of 98,955 homes over the twenty-year period between 2017 and 2037. <b>The minimum housing capacities identified for the Local Plan development sites are optimised to help meet this need.</b>  A Local Housing Needs Assessment is being produced to inform the next OPDC Local Plan. This emerging assessment continues to demonstrate a high level of need of housing between 2025 and 2050 of over 227,000 homes.
Population of the neighbourhood area	2,561 (Census 2021)	The 2021 Census identified an existing population of 2,561 people living in the Old Oak Neighbourhood Area. <b>The current population needs to be considered in the context of the growth across the OPDC area where over 26,000 homes are expected to be delivered.</b>
Most recently available planning strategy of the	<a href="#">OPDC Local Plan 2022</a> and <a href="#">OPDC Old Oak</a>	The most recent LPA planning strategies relevant to the Old Oak Neighbourhood Area comprise the Local Plan and Old Oak West SPD. The Old Oak West SPD is aligned with the Local Plan.

local planning authority	<a href="#">West SPD 2024</a>	<p>These identify:</p> <ul style="list-style-type: none"> <li>• specific development sites, and their minimum housing capacities, within the neighbourhood area. These comprise site allocations and other Local Plan development sites in OPDC's <a href="#">Development Capacity Study Update 2021</a> which contribute to the Local Plan's total housing capacities as set out in table 2 below.</li> <li>• that portions of the Old Oak Neighbourhood Area fall within: <ul style="list-style-type: none"> <li>○ the emerging Old Oak major town centre meaning sites will benefit from new and enhanced access to town centre uses, social infrastructure and public open spaces.</li> <li>○ sensitive locations.</li> </ul> </li> <li>• That the area will also benefit from enhanced public transport access and active travel networks.</li> </ul> <p>The above demonstrate the area has been allocated as an area for growth while appropriately responding to sensitive locations. These elements were considered when defining the capacities of the development sites during the Local Plan plan making process.</p>
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Table 2: OPDC Local Plan site allocations and development sites

Site	Site reference	Minimum homes capacity
Goodhall Street East	DCS site 54 (part of)	42
Ursula Lapp	DCS site 55	250
Lords Builders Merchants	Site allocation 26 (part of)	158
Old Oak Cafe (2 Victoria Terrace)	DCS site 16	10
Midland Gate	DCS site 30	50
<b>Total</b>		<b>510</b>

The 2019 PPG Paragraph: 101 Reference ID: 41-101-20190509 states, for developing a housing requirement figure, that *“While there is no set method for doing this, the general policy making process already undertaken by local authorities can continue to be used to direct development requirements and balance needs and protections by taking into consideration relevant policies such as the spatial strategy, evidence such as the Housing and economic land availability assessment, and the characteristics of the neighbourhood area, including its population and role in providing services. In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or assets of particular importance (as set out in paragraph 11, footnote 6), which may restrict the scale, type or distribution of development in a neighbourhood plan area.”*

The above PPG text makes clear that an IHR may be provided following a similar approach to that for providing a housing requirement figure i.e. it is a broad assessment that looks at relevant policies such as the spatial strategy, evidence such as the housing and economic land availability assessment, and the characteristics of the neighbourhood area, including its population and role in providing services. OPDC's Development Capacity Study Update 2021 confirms that it is OPDC's housing and economic land availability assessment. The DCS sites noted in table 2 form part of OPDC's Local Plan and contribute to the Local Plan's total housing capacities and form part of the

spatial strategy. For the Local Plan period this total housing capacity is 19,850 as set out in policies SP4 and H1.

#### Relationship between the PPG and draft NPPF

The 2019 PPG currently provides guidance relating to developing an IHR which does not fully align with the draft NPPF. It states there is “not set method” for defining an IHR. It provides references to using content that is consistent with the draft NPPF comprising considering the spatial strategy, Housing and Economic Land Availability Assessment and population

However, the 2019 PPG refers to considering the characteristics of the area and its role in providing services which are not referred to in the draft NPPF. Therefore, for the purposes of defining an IHR for the Old Oak Neighbourhood Area, these latter two elements have not been considered.

#### Examining an IHR

PPG Paragraph: 104 Reference ID: 41-104-20190509 notes that a neighbourhood area housing requirement figure, which is stated within a Local Plan, is not retested at the Examination of a neighbourhood Plan. However, it states that an indicative housing requirement figure will need to be tested at examination.